

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Trans-Lite, Inc.

120 Wampus Lane
Milford, Connecticut 06460

November 16, 2011

Prepared For:

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Milford, Connecticut 06460

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ACRONYMS AND ABBREVIATIONS

| | |
|---------------|--|
| AIRS | Permitted Air Sources Listing |
| AMEC | AMEC Environment and Infrastructure |
| amsl | above mean sea level |
| AOC | Area of Concern |
| AST | Aboveground Storage Tank |
| Burndy | Burndy Corporation |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act |
| CERCLIS-NFRAP | Comprehensive Environmental Response, Compensation, and Liability Information System No Further Action Required |
| COCs | Constituents of Concern |
| CT DEEP | Connecticut Department of Energy and Environmental Protection |
| CT PROPERTY | Connecticut Property Transfer Act Sites |
| 1,1-DCE | 1,1-Dichloroethylene |
| DNAPL | Dense Non-Aqueous Phase Liquid |
| ECAF | Environmental Condition Assessment Form |
| EDR | Environmental Data Resources, Inc. |
| ELUR | Environmental Land Use Restriction |
| EPRB | Emergency planning and Response Branch |
| EPS | Environmental Products & Services, Inc. |
| ERM | Environmental Resources Management, Inc. |
| ERNS | Emergency Response Notification |
| ESA | Environmental Site Assessment |
| FCI | Framatone Connectors International |
| FFIS | Federal Facilities Information System |
| FINDS | Facility Index System/Facility Registry System |
| FRSR | Final Radiological Status Report |
| FURS | Federal Underground Injection |
| GIS | Geographic Information System |
| GPLPE | General Permit to Limit Potential to Emit |
| HSWA | Hazardous and Solid Waste Amendments |
| HWSA | Hazardous Waste Storage Area |
| I/C DEC | Industrial/Commercial Direct Exposure Criteria |
| LUST | Leaking Underground Storage Tank |
| LWDS | Connecticut Leachate and Wastewater Discharge Sites |
| MACTEC | MACTEC Engineering & Consulting, Inc. |
| MANIFEST | Hazardous Waste Manifest Database |
| mg/kg | milligrams per kilogram |

Phase I Environmental Site Assessment, Trans-Lite, Milford, Connecticut
AMEC Environment and Infrastructure Project 3610110095

| | |
|---------------|---|
| MOH | Metal Hydroxide |
| MSDS | Material Safety Data Sheet |
| MTA | Metropolitan Transportation Authority |
| NPDES | National Pollution Discharge Elimination System |
| NPL | National Priorities List |
| PADS | PCB Activity Data System |
| PAHs | Polycyclic Aromatic Hydrocarbons |
| PA/SI | Preliminary Assessment/Site Investigation |
| PCBs | Polychlorinated Biphenyls |
| PCE | Tetrachloroethylene |
| PCS | Permit Compliance System |
| POTW | Publically Owned Wastewater Treatment |
| RAP | Remedial Action Plan |
| RCRA | Resource Conservation and Recovery Act |
| RCRA CORRACTS | RCRA Corrective Action |
| REC | Recognized Environmental Condition |
| RI/FS | Remedial Investigation/Feasibility Study |
| RSR | Remediation Standard Regulations |
| SCGD | Site Characterization Guidance Document |
| SDADB | Site Discovery and Assessment Database |
| sf | square foot |
| SHWS | State Hazardous Waste Sites |
| SIC | Standard Industrial Code |
| Site | 120 Wampus Lane in Milford, New Haven County, Connecticut |
| START | Superfund Technical Assessment and Response Team |
| SWF/LF | Solid Waste Facility/Landfill |
| 1,1,1-TCA | 1,1,1-Trichloroethane |
| TCE | Trichloroethylene |
| TPH | Total Petroleum Hydrocarbons |
| Trans-Lite | Trans-Lite, Inc. |
| TSD | Treatment, Storage and Disposal Facility |
| ug/l | micrograms per liter |
| USEPA | United States Environmental Protection Agency |
| USGS | United States Geological Survey |
| UST | Underground Storage Tank |
| VC | Volatilization Criteria |
| VCP | CT DEEP Voluntary Remediation Program |
| VOC | volatile organic compound |
| WMA | Wampus Milford Associates |

EXECUTIVE SUMMARY

This Executive Summary is a brief overview of the findings, and is not intended to substitute for the complete report. AMEC Environment and Infrastructure (AMEC), was contracted by Trans-Lite, Inc. (Trans-Lite) to perform a Phase I Environmental Site Assessment (ESA) of its property and operating facility located at 120 Wampus Lane in Milford, New Haven County, Connecticut (the Site). The purpose of the Phase I ESA is to identify areas of potential environmental concern associated with the Site.

The Phase I ESA was prepared to generally conform to the requirements of the Connecticut Department of Energy and Environmental Protection (CT DEEP) Site Characterization Guidance Document (SCGD) (CT DEEP, 2010). The SCGD states that *a Phase I Environmental Site Assessment (ESA) is an evaluation of the current and historical uses of a site and the activities that have been conducted at a site, for the purpose of identifying all areas of concern (AOCs) at which a release to the environment has the potential to have occurred.* For the ESA, AMEC performed a city file review and Site reconnaissance on February 1, 2011, with subsequent telephone calls to municipal offices and reviews of environmental regulatory databases and historical information.

The list below is a summary of key Site features.

- The rectangular, 2.07-acre Site is owned by Trans-Lite in an industrial zoned area.
- The Site building consists of approximately 54,843 square feet with the initial structure constructed in 1950, with several additions added since.
- Trans-Lite purchased the Site in 1966 with Trans-Lite's predecessor purchasing the property in the early 1950's.
- Trans-Lite manufactures lighting for many types of subway and rail cars. J. Burdon, a division of Trans-Lite, is also located in the Site building and manufactures gundrills.
- The Site building is connected to municipal water and sewer but previously utilized on Site septic systems for wastewater disposal.
- Petroleum products and chemicals are currently and have historically been used on Site, and hazardous and non-hazardous wastes are currently and have historically been generated on Site.
- Aboveground storage tanks (ASTs) used for chemical storage were observed during the Site reconnaissance.
- Underground storage tanks (USTs) used for liquid storage were identified during the Site reconnaissance.

The AOCs included in the table below were identified during the ESA.

Table ES-1
Summary of Site AOCs

| Name | Description |
|---|---|
| AOC 1 - Parts Washing Room | This room formerly contained a former solvent-based vapor degreaser and a former floor drain. There is also a subgrade pit located in the room and chemicals were formerly stored in the room. |
| AOC 2 – Former and Current Heating Oil UST | A 5,000-gallon fuel oil containing UST is located to the south of the building. The current UST replaced a former fuel oil containing UST at the same location. |
| AOC 3 – Historic Septic Systems | Septic systems were formerly located to the east and west of the building. The main septic system was located to the east of the building and formerly received wastewaters from Site processes. |
| AOC 4 – Paint Room | Paint is stored and applied in this room. A paint booth is currently located within the room and a second paint booth was formerly located in the room. |
| AOC 5 – Silk Screen Department | Silk screening is completed within the west central portion of the building. Paints are stored and used in this area along with solvents. |
| AOC 6 – Hazardous Materials Storage | Hazardous materials are stored in a small area within the central portion of the building. |
| AOC 7 – Shipping and Receiving, Former Hazardous Waste Storage and Solid Waste Dumpster | Shipping and receiving is located at the northeast corner of building and includes loading docks. A hazardous waste storage area is located within the shipping and receiving area and a solid waste dumpster is located adjacent to the loading docks. |
| AOC 8 - Loading Docks | In addition to shipping and receiving, loading docks are located at the southeastern portion of the building and along the rear, northern edge of the building. |
| AOC 9 - Stormwater System/Drainage Swale | A drainage swale is located northeast of the building and receives the majority of the Site's stormwater and potentially former Site wastewaters. |
| AOC 10 – Off-Site Concerns | Neighboring properties to the west (80 Wampus Lane) and east (160 Wampus Lane) have documented and potential soil and groundwater contamination. |

1.0 INTRODUCTION

In behalf of Trans-Lite, AMEC has completed a Phase I ESA of the Trans-Lite property and facility located at 120 Wampus Lane in Milford, Connecticut (Site). The purpose of this Phase I ESA is to establish the baseline for understanding historical and current Site activities necessary to perform appropriate Site investigation activities, as required, based on review of available information and observations.

This assessment was performed as outlined in the AMEC *Proposal for Professional Services*, dated January 24, 2011. Written authorization was received from Trans-Lite on January 24, 2011.

1.1 PROCEDURES

The Phase I ESA was prepared to generally conform to the requirements of the CT DEEP SCGD (CT DEEP, 2010). The SCGD states that a *Phase I Environmental Site Assessment (ESA)* is an *evaluation of the current and historical uses of a site and the activities that have been conducted at a site, for the purpose of identifying all areas of concern (AOCs) at which a release to the environment has the potential to have occurred.* To identify the AOCs as required by the CT DEEP, AMEC completed the tasks below for the ESA.

- **Site Reconnaissance** - Site inspection of the facility and property. Observe activities on neighboring properties from within the Site's property lines and from the street.
- **Interviews** - Interview individuals knowledgeable of Site operations and history.
- **Review Facility Records** - Review environmental records maintained by the facility and information regarding Site operations.
- **Review Local Municipal Records** - Contact and/or review records maintained by the city of Milford from the following municipal departments: City Clerk, Tax Assessor, Building/Engineering Department, Inland Wetlands Office, Fire Marshal's Office, and Health Department.
- **Review Federal Environmental Records** - Procure and review an environmental database radius search purchased from Environmental Data Resources, Inc. (EDR). EDR maintains databases of federal and state records.
- **Review State Environmental Records** - Review available records maintained by the CT DEEP for the Site.
- **Review of Previous Environmental Reports** - Review of available previous environmental reports for the Site.

- **Review of Historical Use Documentation** - Purchase and review historical use documentation for the Site purchased from EDR. EDR maintains an inventory of aerial photographs, Sanborn Maps, City Directories and historical topographic maps.
- **Environmental Setting** - Review mapping on topography, geology, hydrology, soils and groundwater and surface classifications and uses for the Site and surrounding properties.
- **Report** - Prepare a report summarizing the Phase I activities and research and develop a list of AOCs for the Site. As identified in the SCGD, AOCs include *locations or areas at a site where hazardous waste and or hazardous substances (including petroleum products) have been or may have been used, stored, treated, handled, disposed, spilled, and/or released to the environment.*

Review of the City of Milford, Connecticut, municipal departments' files and the Site reconnaissance were conducted by AMEC on February 1, 2011, with subsequent telephone calls to the municipal offices made during the week of February 7, 2011, and follow-up correspondence with the Site contact during subsequent weeks in February 2011. A review of environmental regulatory databases and historical information was also completed in February 2011.

This Phase I ESA did not include items such as sampling or evaluating buildings for lead-based paint, radon, asbestos-containing materials or ambient air quality, identifying ecological conditions, compliance issues, health and safety issues or testing of the soil, air, surface water, drinking water, or groundwater for chemical contaminants.

2.0 SITE SETTING

This section includes a general description of the Site and information regarding the Site's physical setting, including geology and hydrogeology.

2.1 GENERAL DESCRIPTION

The Site is a 2.07-acre parcel recorded on the City of Milford Tax Map 055 as Block 813, Lot 1C in an industrial zoned area (Appendix A). Property types surrounding the Site include industrial, residential, and parcels that fall within the Corridor Design Development District 1 and 4. These two districts include uses such as commercial, retail, and residential. The general Site location is shown on Figure 1, and the configuration of the Site is shown on Figures 2 and 3.

Trans-Lite manufactures lighting for many types of subway and rail cars. The facility purchases aluminum and steel sheet metal and stock and therefore does not conduct foundry or casting operations at the Site. A large portion of the Trans-Lite operations include assembly of the lights with fabricated metal pieces and plastic or glass lenses. Metal from the suppliers is cut, machined, polished, and welded in the sheet metal fabrication area (Figure 3).

J. Burdon, a division of Trans-Lite, is also located on the property and manufactures gundrills. Gundrills are straight fluted drills used for deep hole drilling of metal. The gundrill operations include grinding, cutting, and sharpening of metal stock.

Based on available historical records (Appendix B), an initial 15,600-square foot building was constructed on the Site in 1950 and consisted of office and manufacturing space. The Site was reportedly occupied by Safety & Lighting Company (predecessor of Trans-Lite) from the early 1950s until the Site was purchased by Trans-Lite on November 29, 1966, according to the City of Milford Assessor's card. Four additions and other upgrades to the initial building were constructed as described in the table below. Additions 1 through 3 included a sequence of expansions of the building further north with each addition.

Table 2-1
Building Construction Information

| Building/Addition | Year(s) of Construction | Square Footage Primary Current Use |
|------------------------------|--------------------------------|---|
| Initial Building | late 1950s | 15,600 square feet Office space and sheet metal |
| Addition 1 | 1964 | 6,640 square feet Office, engineering, and sheet metal operations |
| Addition 2 | 1965 | 13,280 square feet Manufacturing, assembly, shipping and receiving |
| Addition 3 | 1969-1970 | 15,040 square feet Manufacturing, assembly, shipping and receiving |
| Addition 4 | 1975 | 1,040 square feet second story Office space |
| Roof over existing open area | 2005 | 1,323 square feet roof |
| Added mezzanine | 2006 | 1,920 square feet Office space |

Exterior portions of the Site are generally paved on the east side for use as access roadways for deliveries and as parking areas. The northern, western, and southern sides of the Site are landscaped adjacent to the building.

The Site is bounded by a mixture of industrial and commercial facilities, and residential and undeveloped properties as follows. Figure 4 presents the areas surrounding the Site.

- **North** – Undeveloped land and marshland of Stubby Plain Brook to the north followed by residential properties on Corona Drive.
- **East** – The B&A Company at 160 Wampus Lane. This is a machine shop. Further east at 160 Wampus Lane is Epifano Builders Inc., and beyond is undeveloped land and the Indian River.
- **South** – The active Metropolitan Transportation Authority (MTA) Metro-North Railroad line followed by Commercial and Residential properties along Buckingham Avenue and State Highway Route 162.
- **West** – 80 Wampus Lane. A variety of industrial and commercial businesses are located on the parcel in an industrial facility building: American Dry Stripping; Answer Trucking; Blakeslee; Arpaia & Chapman Inc.; Blasting Media Sales LLC; Gravino Furniture; Milford Stone LLC; Northeast Stair Products LLC; Specialty Woodworks; and Stove Purcell Architectural.

Photographs of the Site and surrounding areas were taken by AMEC personnel and are included in Appendix C.

The Site is provided water by the South Central Connecticut Regional Water Authority, and sewer by the City of Milford Department of Public Works. The facility is heated by a Burnham, Multi-Pass Commercial boiler that can be operated using No. 2 fuel oil from the on-Site UST, which is located on the southeast corner of the building, or by natural gas. This boiler was recently installed and replaced an older boiler which may have been the initial boiler used at the facility. The natural gas line enters the building on east wall located towards the southern end of the building. Electricity is provided by overhead lines located on the southeastern side of the Site.

2.2 GEOLOGY AND HYDROGEOLOGY

Information regarding surface and subsurface drainage and geology are presented as they provide an indication of the likely direction of groundwater flow, and therefore potential contaminant transport, if present on Site or off site. The term "upgradient" refers to a location hydraulically upstream of the Site.

AMEC reviewed the following information in regard to the geology and hydrogeology of the Site and surrounding area:

- United States Geological Survey (USGS) Topographic Map, Milford, dated 1984, photo revised from 1960.
- CT DEEP and USGS, Bedrock Geological Map of Connecticut: Connecticut Geological and Natural History Survey, 1985.
- Geology of the Conterminous U.S. at 1:2,500,000 Scale – a digital representation of the 1974 P. B. King and H.M. Beikman Map, USGS Digital Data Series - 11 (1994).
- Previous Environmental Reports.
- City of Milford Geographical Information System (GIS) Database.

2.2.1 Geologic Setting

The surficial materials overlaying bedrock at the Site consists of three general overburden units: the Upper Sand Unit, the Middle Aquitard Unit, and the Lower Sand and Gravel Unit. The Upper

Sand Unit consists of moderate to dark yellowish brown fine to medium sand, with intervals of fine to coarse sand. The Middle Aquitard Unit consists of dark yellowish brown silt and fine sand, grading downward to silt and clay in many soil borings conducted at the Site. Depths to the Middle Aquitard Unit were between 14 and 31 feet below the ground surface (ft bgs). The Lower Sand and Gravel Unit consists of dark yellowish brown fine sand to medium sand, coarse sand, fine gravel, and medium gravel.

According to the EDR report (Appendix D), bedrock in the vicinity of the Site is of the Ordovician Bedrock of the Paleozoic Era, classified as Eugeosynclinal Deposits overlain with silt and gravels deposited over time by storm surge-area. Depth to bedrock at the Site has been reported at 32 to 40 ft bgs in prior environmental reports.

2.2.2 Topography and Surface Drainage

The majority of the Site is covered with buildings or paved roadways, with storm drains and roof leaders from these areas discharging to a 12-inch diameter concrete drainage pipe located on the northeast corner of the building which conveys the stormwater to a manmade swale located north of the Site building (Figure 2). The swale empties into the marshland/wetland and Stubby Plain Brook marshland/wetlands located approximately 230 feet north, northeast of the Site.

Stubby Plain Brook, although not specifically classified, would be considered a Class A surface water. Class A surface waters are designated for habitat, potential drinking water, recreation and navigation, and a water supply for industry and agriculture. Stubby Pain Brook runs parallel to the Indian River, and then cuts eastward south of Sunnyside Lane to join with the Indian River northwest of the Indian River Bridge at New Haven Avenue, approximately 2,000 feet east of the Site.

The Indian River has a SC/SB surface water classification, which indicates that the river is designated for use as habitat for marine fish and aquatic life and wildlife; commercial shellfishing; recreation; industrial water supply; and navigation. Class SC water quality designation indicates point or non-point sources of pollution (i.e., combined sewer overflows, urban runoff, inadequate wastewater treatment or septic system failure, etc.), and that one or more designated uses assigned to Class SB waters are not being met.

Historic and current U.S. Geological survey maps of the Site property were obtained from EDR and reviewed. The maps included the Milford Quadrangle, U.S. Geological Survey, 7.5 minute, Topographic Maps dated 1943, 1951, 1960, 1970, and the current version 1984 (see Appendix D). Two Bridgeport (and vicinity) Quadrangles, U.S. Geological Survey were also reviewed, one 7.5 minute series, topographic map dated 1951 and one 15 minutes series topographic map dated 1893 obtained from EDR (Appendix D).

The 1984 topographic map shows the topography of the Site property sloping downward slightly from south to north toward Stubby Plain Brook, with the majority of the Site being located between 10 and 15 feet above mean sea level (amsl). The drainage swale located proximal to the stormwater drainage pipe located near the northern property line is located below the elevation of the Site.

2.2.3 Groundwater

Shallow overburden groundwater generally flows in directions of ground surface topography to points of discharge such as creeks, swamps, drainage swales or pumped groundwater wells. Previous investigations at the Site and adjacent properties have determined that the groundwater flow direction in the three Zones (Shallow, Intermediate, and Deep) at the Site is predominantly from southwest to the northeast, toward the Indian River watershed and Stubby Plain Brook. The Shallow and Intermediate Zones refer to the upper and lower portions of the Upper Sand Unit, respectively, and the Deep Zone is the Middle Aquitard Unit. The gradient is typically very flat and some deviation in calculated groundwater flow direction has occurred. Groundwater has been measured at an average depth of 5 ft bgs.

The CT DEEP Water Quality Classifications Maps available on the CT DEEP website indicate that the groundwater in the Site area has been assigned a "GB" classification, which indicates that the groundwater is located within a historically highly urbanized area or an area of intense industrial activity where public water service is available. Groundwater classified as GB is not suitable for human consumption without treatment.

According to the EDR report (Appendix D), a Public Water Supply well is located ½ to 1 mile west of the Site. However, the information contained in the report does not indicate the status of the well nor the reported population it serves.

3.0 PRIOR ENVIRONMENTAL INVESTIGATIONS

AMEC reviewed prior investigation reports and associated correspondence for the Site and several environmental reports for the neighboring properties. The following subsections provide a summary of previous Site investigation activities and their associated findings based on a review of those documents.

- Report on Hydrogeologic Investigations Performed on Vacant Parcel, Wampus Lane, Milford, Connecticut, prepared by HRP Associates, Inc. (HRP), dated April 8, 1993.
- Draft Results of the Preliminary Site Investigation, Trans-Lite, Inc. Facility, Milford, Connecticut, prepared by Fuss & O'Neil, Inc. (F&O), dated January 15, 1998.
- Draft Phase I Environmental Site Assessment, Trans-Lite, Inc. Milford, Connecticut, prepared by F&O, dated March 2001 (partial).
- Focused Remedial Investigation / Feasibility Study Report, Trans-Lite, Inc. Milford, Connecticut, prepared by F&O, dated February 2002 (partial).
- Soil Excavation Report, Trans-Lite, Inc., 120 Wampus Lane, Milford, Connecticut, conducted by MACTEC Engineering & Consulting, Inc. (MACTEC), dated December 2002.
- Groundwater Sampling Event, Trans-Lite, Inc., 120 Wampus Lane, Milford, CT, conducted by MACTEC, April 2006. Letter dated May 11, 2006.
- Groundwater Sampling Event, Trans-Lite, Inc., 120 Wampus Lane, Milford, CT, conducted by MACTEC in January 2011. Letter dated March 3, 2011.

3.1 REPORT ON HYDROGEOLOGIC INVESTIGATIONS PERFORMED ON VACANT PARCEL, WAMPUS LANE, MILFORD, CONNECTICUT – 1993

On behalf of the Burndy Corporation, HRP implemented a groundwater quality assessment program for the surface impoundments (i.e., lagoons) located at the 80 Wampus Lane property. As part of the program, HRP recommended investigations to determine if the groundwater quality had been impacted by off-site properties. HRP conducted soil vapor sampling along the southern boundary of Burndy's vacant parcel along Trans-Lite's and 160 Wampus Lane's northern property boundary (see Appendix E). Chlorinated volatile organic compounds (VOCs), including tetrachloroethylene (PCE) and 1,1,1-trichloroethane (1,1,1-TCA), were detected in the soil vapor samples. To assess the groundwater impacts in that area, HRP installed and collected samples from four groundwater monitoring wells. HRP concluded that Trans-Lite and the Mitchell-Bradford Chemical Company (160 Wampus Lane) were the suspected sources of chlorinated

VOCs present in the groundwater on the vacant Burndy property, and that 1,1,1-TCA was originating from the Trans-Lite property.

3.2 DRAFT RESULTS OF THE PRELIMINARY SITE INVESTIGATION - 1998

In response to the hydrogeologic investigation (soil gas and groundwater sampling) conducted by HRP, Trans-Lite collected water samples from the parts washing room drainage pit, runoff in the shipping area, and from an existing groundwater monitoring well (Well 1) on the west side of the Site. Results of these samples showed chlorinated VOCs, including 1,3-dichlorobenzene, 1,1,1-TCA, PCE, and trichloroethylene (TCE), and their various breakdown products.

Trans-Lite contracted F&O to complete a preliminary Site investigation in 1997, which included the installation of soil borings and the collection of soil and groundwater samples at the western (SB-1 and SB-2), northern (SB-3 and SB-4), and eastern (SB-5) Site boundaries. A soil boring was also conducted inside the building at the parts washing room drainage pit in the vicinity of the former solvent-based degreaser (SB-6). Historically, this drainage pit was open at the floor surface and extended downward approximately 4 feet into natural soil and was the discharge point for floor washing runoff and potentially other liquids that were released to the floor.

Results of the preliminary investigation showed that no widespread contamination was emanating from the upgradient portion of the Burndy Corporation or other upgradient properties, but that a release of VOCs to soils at the Site and impact to downgradient groundwater had occurred. F&O recommended further investigations to include additional borings in the parts washing room pit to assess the vertical extent of soil contamination, potential for presence of free-phase solvent on top of the silt/clay layer, and to determine the southerly and downgradient extent of groundwater contamination. Appendix E includes a map showing the locations of the borings and wells.

3.3 DRAFT PHASE I ENVIRONMENTAL SITE ASSESSMENT – MARCH 2001

The March 2001 Draft Phase I ESA was prepared by F&O for Trans-Lite and reportedly followed the requirements of ASTM E 1527-00 and the CT DEEP Transfer Act Site Assessment Guidance Document.

The Draft Phase I ESA identified the following Recognized Environmental Conditions (RECs) which are analogous to AOCs:

- Paint Gun Washer (located in the Paint Room)
- Paint Locker (located in the Paint Room)
- Concrete Pit in Cleaning Room
- Drainage Pit near Former Degreaser (located in the Cleaning Room)
- Silkscreen Washer
- Warehouse/Stockroom
- Hazardous Waste Storage Areas (HWSA) (located in Shipping & Receiving)
- Loading Dock (southeast corner of the building)
- On-Site Septic Systems (located both west and east of the building)
- Stormwater System/Drainage Swale (Drainage Swale located northeast of the building)
- Heating Oil UST (located south of the building)
- Refuse Dumpster (located to the northeast of the building near Shipping & Receiving)
- Off-site RECs (80 and 160 Wampus Lane)

Information from this prior Phase I was incorporated into relevant sections of this report.

3.4 FOCUSED REMEDIAL INVESTIGATION / FEASIBILITY STUDY (RI/FS) REPORT - 2002

On behalf of Trans-Lite, F&O collected and analyzed additional information on the geology and distribution of contaminants in the vicinity of the parts washing room drainage pit source area to determine appropriate remediation approaches. F&O conducted the RI/FS from June to November 2001, which included the installation of direct-push borings at three locations at the Site perimeter, four soil borings in the vicinity of the drainage pit, and installation and sampling of new and the sampling of existing monitoring wells at the Site.

Prior to the RI/FS, F&O conducted a supplemental hydrogeologic investigation which included the installation and sampling of monitoring wells MW-01I through MW-04I. The groundwater data confirmed the presence of VOCs in the groundwater near and downgradient of the drainage pit. The results of this investigation indicated that a silt aquitard (Middle Aquitard Unit) underlies the Upper Sand Unit at a depth ranging from 17 to 28 ft bgs beneath the western portion of the Site. In MW-01, bedrock was encountered at approximately 38 ft bgs. F&O concluded that dissolved-phase chlorinated VOCs were present in groundwater beneath the Site.

In the RI/FS report, F&O concluded that the horizontal flow of groundwater was generally to the northeast within the three overburden Zones. The highest soil chlorinated VOC concentrations

were close to the drainage pit, the presence of which was likely the result of release of chlorinated VOCs at the Site. F&O determined that dense non-aqueous phase liquid (DNAPL) was present in the shallow soil beneath the drainage pit, and at the base of the Upper Sand Unit beneath the drainage pit. Due to the elevated levels of chlorinated VOCs, remediation of the source was required in accordance with the Connecticut Remediation Standard Regulations (RSRs).

For groundwater, F&O concluded that a chlorinated VOC groundwater plume, with the highest concentrations occurring at the base of the upper sand beneath the drainage pit, extended from the southwestern portion of the Site northeastward, and continued off Site to the northeast. F&O submitted soil and groundwater samples monitored natural attenuation parameter analyses, and concluded that the Site groundwater exhibited some evidence of natural attenuation.

F&O suggested a combination of soil excavation with in-situ bioremediation, and groundwater monitoring as the recommended approach for remediating the contaminated soils and groundwater in the drainage pit area.

3.5 SOIL EXCAVATION REPORT, TRANS-LITE, INC. – DECEMBER 2002

On behalf of Trans-Lite, MACTEC (now AMEC) implemented an excavation program to remove soils from the unsaturated zone beneath the floor of the building the vicinity of the former drainage pit where contamination was detected during previous investigations by F&O in 1997 and 2001 (see Sections 3.2 and 3.4). These previous investigations revealed elevated levels of chlorinated VOCs in soil and groundwater in the area of the drainage pit, and the potential presence of DNAPL beneath the floor of the building.

MACTEC completed five sub-slab, shallow soil borings with hand-sampling equipment prior to the excavation program to better define the soil contamination. Based on the results of the shallow soil sampling and prior investigation, a remedial excavation was completed to excavate soils within and surrounding the former drainage pit. The eastern half of the excavation was completed to a depth of approximately 1.0 to 1.5 ft bgs. Confirmatory soil samples were collected from the eastern excavation and the results were below remedial criteria.

The western portion of the remedial excavation was completed to a depth of 5.5 ft bgs where groundwater and some droplets of NAPL were observed in the excavation. Confirmatory soil

samples were collected which indicated that soils with concentrations above remedial criteria remained. The excavation was expanded laterally to the west and soil removal was completed to a depth of 7 ft bgs at this location. Due to soil stability concerns, the excavation was quickly backfilled with clean fill and concrete was poured to match the floor surrounding the excavation (i.e., the drainage pit no longer exists). The final extent of the remedial excavation measured 16 feet long by 5 feet wide.

The confirmatory results indicated that the soils above the groundwater surface were compliant with the two applicable RSR soil criteria for the Site. Approximately 14 tons of soil was removed from the excavation and disposed as hazardous waste.

3.6 GROUNDWATER SAMPLING EVENT – APRIL 2006

In 2006, MACTEC collected groundwater samples from existing Site monitoring wells and piezometers to assess groundwater quality and checked for the presence of DNAPL prior to sampling. The results of the April 2006 sampling event show that chlorinated VOCs were present in many on-Site wells, but the majority of the concentrations were below applicable RSR criteria. The two wells (MW-02I and MW-01I) which contained elevated concentrations of chlorinated VOCs in 2001, had concentrations below RSR criteria. However, DNAPL was observed at the bottom of MW-02I, with approximately 2 ounces removed prior to sampling. DNAPL was not observed in the other wells or piezometers.

MACTEC concluded that overall, the groundwater plume under the building was migrating to the north (downgradient) and potentially downward in the overburden soils. The concentrations of chlorinated VOCs diminished significantly in the former drainage pit area and decreased in wells screened in the Upper Sand Unit, with steady or slightly increasing trends in the deeper zone wells within the Middle Aquitard Unit. MACTEC recommended a quarterly groundwater monitoring program to determine if the variations were due to seasonal trends or actual decreases in concentrations of chlorinated VOCs.

3.7 GROUNDWATER SAMPLING EVENT – JANUARY 2011

MACTEC returned to the Site in January 2011 and collected samples from the existing groundwater monitoring wells and piezometers to assess groundwater quality. MW-02I was

gauged for the presence of DNAPL, but DNAPL was not observed in the well.

Chlorinated VOCs were detected in 12 of the 13 wells sampled with some concentrations above remedial criteria. The highest concentrations were detected in well MW-02I, located directly adjacent to the former drainage pit in the parts washing room. The detected concentrations were similar to pre-remediation data from September 2001, indicating that a potential source area still exists in the vicinity of the MW-02I.

Elevated chlorinated VOC concentrations were detected in the MW-07 series wells located downgradient of MW-02I. Overall, the highest concentrations of chlorinated VOCs were detected in the wells installed at the base of the Upper Sand Unit which is above the Middle Aquitard Unit. Chlorinated VOCs were detected within the Middle Aquitard Unit indicating that some migration into this unit has occurred but the concentrations are significantly reduced in comparison to chlorinated VOCs in the Upper Sand Unit. The presence of 1,1-dichloroethylene (1,1-DCE) and other breakdown products, especially in downgradient wells, indicates that chlorinated VOC degradation is naturally occurring.

MACTEC compared the 2011 data to historic sampling data. The combined data set presents inconsistent trends with select chlorinated VOCs increasing and others decreasing and there is variation from well to well. Correlation of the data is difficult due to the extended timeframe between sampling events. MACTEC recommended supplementary investigation to determine if an additional source area exists in shallow or intermediate soil near the parts washing room and former solvent vapor degreaser which may be contributing to the chlorinated VOCs in groundwater. The supplemental investigation is warranted to further delineate horizontal and vertical extents of the chlorinated VOC plume and to develop a remedial approach to reduce the elevated chlorinated VOCs that continue to exist in groundwater at the Site.

4.0 HISTORICAL USE AND LOCAL MUNICIPALITY DOCUMENTS

This section includes available historical information reviewed by AMEC to evaluate previous Site and near site activities and potential AOCs. Findings from historical information sources such as Sanborn Fire Insurance Company and USGS topographic mapping, aerial photographs, city directories and municipal office files are discussed below.

4.1 HISTORICAL USE DOCUMENTS

Historical information sources and results of their review are presented below.

4.1.1 Sanborn Maps

Sanborn Fire Insurance Maps were not available for the Site.

4.1.2 USGS Topographic Maps

USGS topographic maps were reviewed for the years 1893, 1943, 1951, 1960, 1971, and 1984 (Appendix D). The Site building is first visible on the 1960 topographic map. Other buildings are also present to the west (80 Wampus Lane) and east (160 Wampus Lane) of the Site. Subsequent maps (1971 and 1984) show these buildings and the Site building, with additions.

- The 1893 and 1943 topographic maps show streets, railroad tracks, water bodies, and few topographic contours. No Site or nearby features are depicted on these maps. Indian River is visible on these maps, but Stubby Plain Brook is not.
- The 1951 topographic maps show no Site features. However, a portion of the former Burndy Corporation facility (80 Wampus Lane) is visible on these maps. Indian River and Stubby Plain Brook are visible. The railroad tracks south of the Site are visible on these maps.
- The 1960 topographic map shows the initial portion of the Site building. The footprint of the Burndy Corporation building to the west (80 Wampus Lane) is also larger, and a new building is visible to the east of the Site at 160 Wampus Lane. An apparent small water way/channel appears to have been constructed from the rear of the former Burndy Corporation building (80 Wampus Lane) to Stubby Plain Brook. Additional buildings are present further to the northwest.
- The 1971 and 1984 topographic maps include additional structures to the northwest, and the buildings directly west (80 Wampus Lane) and east (160 Wampus Lane) of the Site have additions. Additions are present on the Site building in the 1971 map. A building on 180 Wampus Lane was first visible on the 1971 map and expanded on the 1984 map.

4.1.3 Aerial Photographs

Aerial photographs were available and reviewed for the years 1940, 1963, 1975, 1980, 1985, 1991, and 2006.

- The 1940 aerial photograph shows the area of the Site as undeveloped, but with some land disturbance at the former Burndy Corporation property at 80 Wampus Lane. Stubby Plain Brook is visible to the north. Railroad tracks and structures are visible to the south.
- The 1963 aerial photograph shows the Site building and extensive development in the vicinity of the Site including the Burndy Corporation, and the building just east of the Site at 160 Wampus Lane. Apparent paved areas are visible at the Site and at the adjacent properties (east and west).
- The quality of the 1975 aerial photograph is poor. Building additions apparently occurred at the Site. Extensive land clearing is visible to the east of the Site as well as the addition of a building at 180 Wampus Lane.
- The Site is predominantly unchanged in the 1980 aerial photograph.
- The 1985 aerial photograph is illegible.
- No significant changes to the Site or the surrounding area were noted in the 1991 and 2006 aerial photographs.

4.1.4 City Street Directories

Available city street directories were reviewed at the Connecticut State Library for the years of 1960 (the oldest listing available) through 2010 at approximately five year increments. Earlier information was obtained from prior environmental reports. The following businesses were identified on Wampus Lane.

Table 4-1 – City Directories

| Summary from Historic Reports | | |
|-------------------------------|-----------------|---|
| Year | Wampus Lane No. | Comments |
| 1945 | - | Wampus Lane was not listed in the street directories |
| 1949 | - | Firth Sterling Steel & Carbide Corp., a tool manufacturer is adjacent to the east at 160 Wampus Lane. |
| 1951 | - | The former Burndy facility is present to the west of the Site at 80 Wampus Lane. |
| 1956 | 120 | Safety Industrial, Inc. (lighting manufacturer) |
| | 160 | Mitchell Bradford Chemical |

Table 4-1 – City Directories

| | | |
|---|------------------------|---|
| 1957-1959 | 80 | Burndy Corporation (electrical equipment manufacturer) |
| Summary of City Directories Review – February 2011 | | |
| Year | Wampus Lane No. | Comments |
| 1960 | - | Burndy Corporation Trans-Lite Mitchell Bradford Chemical |
| 1965 | - | Burndy Corporation Trans-Lite Mitchell Bradford Chemical |
| | 20 | R&R Art Production Service Inc.; Graham Richard Advertising, Inc. |
| 1970 | 20 | R&R Art Production Service Inc.; Graham Richard Advertising, Inc. |
| | 24 | Air Lock Inc. |
| | - | Burndy Corp. |
| | 120 | Trans-Lite |
| | - | Mitchell Bradford Chemical Co. |
| | 180 | Allen Products (microfilming) |
| 1975 | 20 | R&R Advertising Inc., R&R Production Service Inc. |
| | - | Burndy Corp. (electrical equipment) |
| | 120 | Trans-Lite |
| | - | Mitchell Bradford Chemical Co. |
| | 180 | Allen Products |
| 1979 | 20 | R&R Advertising Inc., R&R Production Service Inc. |
| | - | Burndy Corp. (electrical equipment) |
| | 120 | Trans-Lite |
| | - | Mitchell Bradford Chemical Co. |
| | 180 | Allen Products |
| 1985 | - | Burndy Corporation |
| | 20 | Dental Connection |
| | 80 | No information |
| | 120 | Trans-Lite Inc.; Interlite Corp.; Burdon J, Inc.; Techlite, Inc. |
| | 160 | Mitchell Bradford Chemical Company |
| | 180 | Allen Products Co. |
| 1990 | - | Burndy Corporation |
| | 10 | Burndy Corporation Customer Service |
| | 20 | Advanced Recovery Inc.; Wagner HW Corporation |
| | 120 | Trans-Lite Inc.; Interlite Corp.; Burdon J, Inc. |
| | 160 | Mitchell Bradford, International Corp. |
| | 180 | Allen Products Co. |
| 1995 | - | Burndy Corporation |
| | 10 | Listed, but no occupants |

Table 4-1 – City Directories

| | | |
|---------------------------------|-----|--|
| | 20 | HW Wagner Corp. |
| | 80 | Not Listed |
| | 120 | Trans-Lite, Inc.; Burdon Gundrills |
| | 160 | Not Listed |
| | 180 | Not Listed |
| 1996, 1997, 1998, 1999 | - | Framatone Connector |
| 2000 | 10 | Modular Installation Plus; Wampus Milford Associates LLC |
| | 20 | HW Wagner Corp. |
| | 80 | Not Listed |
| | 120 | Trans-Lite, Inc.; Burdon Gundrills |
| | 160 | B&A Company |
| | 180 | Allen Products Co. |
| 2005 | 20 | HW Wagner Corp. |
| | 80 | Alfa Nobel LLC; Milford Stone LLC; American Dry Stripping, Inc. |
| | 120 | J Burdon Div; Trans-Lite |
| | 160 | Assembly Tech; B&A Co.; Hayward Turnstiles, Inc. |
| | 180 | Epitano Builders, Inc. |
| 2007 | 20 | No occupants listed |
| | 80 | Multi-tenant commercial - similar to 2010 |
| | 120 | J. Burdon Div, Trans-Lite |
| | 160 | Assembly Tech; B&A Co.; Hayward Turnstiles, Inc. |
| | 180 | Epitano Builders, Inc. |
| 2010 | 20 | Marks Floors & Walls |
| | 80 | Multi Tennant address: American Dry Stripping; Answer Trucking; Blakeslee; Arpaia & Chapman Inc.; Blasting Media Sales LLC; Gravino Furniture; Milford Stone LLC; Northeast Stair Products LLC; Specialty Woodworks; Stove Purcell Architectural |
| | 120 | Trans-Lite; J Burdon Dive; Kennedy Design Center Agency |
| | 160 | Assembly Tech; B&A Co.; Hayward Turnstiles, Inc. |
| | 180 | Epitano Builders, Inc. |

- = occupant listed under Wampus Lane but an address was not provided

4.2 LOCAL MUNICIPALITY INFORMATION

AMEC reviewed available files of the city of Milford Assessor's Office, City Clerk, Board of Health (BOH), Building Department, Engineering Department, Inland Wetlands, and the on-line GIS Database. The following summarizes the findings of this review:

- The Trans-Lite facility occupies the parcel of land at 120 Wampus Lane. City of Milford, Connecticut records indicate that this parcel consists of approximately 2.07 acres of land that is listed as Tax Map 055 as Block 813 Lot 1C. The parcel is indicated as owned by Trans-Lite and is zoned industrial.
- The property was purchased by the Trans-Lite on November 29, 1966 (Book/Page 00579/5460).
- The BOH provided an application for a septic system dated July 14, 1964, and an application to repair a septic system dated May 15, 1975. Copies of these records are included in Appendix A. The 1964 application indicates that the septic system consists of a 1,000-gallon septic tank, and a 200-foot by 2-foot leaching trench system. The septic system was located 10 feet from the property line and 15 feet from the building. The 1975 application indicates the repaired system had a 1,000-gallon septic tank, and thirteen 4-foot by 4-foot by 4-foot leaching galleries. This system remained 10 feet from the property line and 15 feet from the building. Neither application had a map/drawing to indicate the location of the system on Site.
- The Building Department files contained file cards for the 1979, 2005, and 2006 additions/improvements (Section 2.1 and Appendix A) to the Site building.
- The Inland Wetlands Department provided a map showing the Site, surrounding area and wetlands. Department staff indicated that the Site is located within the Indian River Watershed and is situated approximately 230 feet from the Stubby Plain Brook. The wetland is classified as a fresh-water tidal wetland. The northeastern corner of the building and parking lot are located within a flood zone classified as 2 percent annual chance of occurring. Department staff indicated that the Site does not have any outstanding orders or issues.
- The building is connected to and is authorized by permit no. 17668 to discharge sanitary wastewater to the City of Milford public sanitary sewer system. The Site sanitary sewer line connects to the Milford main sewer line on Wampus Lane as shown on the drawing provided by the Milford Engineering Department. This schematic shows the location and specifications of the Site pump station for the wastewater system. The pump station has a capacity of 2,000 gallons.
- Potable water is provided to the Site by the South Central Connecticut Regional Water Authority.
- City of Milford GIS database provided information regarding flood plain areas and wetlands. Wetlands are located approximately 230 feet to the north, northeast of the Site. A copy of the drawing is provided in Appendix A.

5.0 REGULATORY INFORMATION

AMEC reviewed regulatory database search information provided by EDR, Inc. (see Appendix D) and available information maintained in the public files at the CT DEEP. This regulatory records search is based on information published by State and Federal regulatory agencies and is used to evaluate if the Site or nearby properties are listed as having past or present records of actual or potential environmental impact. Please note that regulatory listings include only those sites which are known to the regulatory agencies at the time of publication to be contaminated, in the process of evaluation for potential contamination, or are otherwise regulated. Each Section below indicates the date that the listing was last updated by EDR. Other regulatory related documents from facility files were also reviewed and are discussed in relevant portions of Section 6.0 of this report.

5.1 GOVERNMENT DATABASES SEARCHED

Regulatory database search results were obtained through EDR to determine the type and number of environmentally regulated sites which might potentially impact the Property. The site listings and search distances researched included the following:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA – aka Superfund Act) established the United States Environmental Protection Agency (USEPA) National Priorities List (NPL) of federal "Superfund" sites. These are the contaminated sites that have been assigned a high ranking, in terms of potential public health effects, by the USEPA. The NPL list was last updated 7/2/2010 (search distance - 1 mile).
- The USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List identifies sites which the USEPA has investigated or is currently investigating for a release or threatened release of hazardous substances pursuant to the CERCLA of 1980 (or Superfund Act). These documented and suspected contamination sites throughout the nation were not ranked high enough to be listed on the NPL. The CERCLIS List was last updated 1/29/2010 (search distance – ½ mile).
- The USEPA lists former CERCLIS sites on the No Further Remedial Action Planned (NFRAP) database. CERCLIS NFRAP List was last updated 6/23/2009 (search distance – ½ mile).
- The USEPA Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA Facilities database is a compilation by USEPA of reporting facilities that generate, store, treat or dispose of hazardous waste. Generators and transporters are found on the RCRAInfo list. Treatment, Storage, and Disposal (TSD) facilities are found on the

RCRAInfo list, and TSD facilities requiring corrective actions are found on the CORRACTS list. The CORRACTS list was last updated 5/25/2010 and the RCRAInfo list was last updated 2/17/2010 (search distance for CORRACTS TSDs - 1 mile; search distance for non-CORRACTS TSDs - ½ mile; search distance for generators - 1/4 mile).

- The USEPA Emergency Response Notification System (ERNS) List is a list of hazardous material spills reported to various state and federal agencies. The ERNS list was last updated 7/9/2010 (search distance Property and adjacent).
- The Connecticut State Hazardous Waste Sites List (SHWS) identifies those properties within Connecticut where a reportable release of oil or hazardous materials, has been identified and reported to the CT DEEP. The SHWS list was last updated 4/23/2010 (search distance - 1 mile).
- The FINDS, Facility Index System/Facility Identification Initial Program, contains both facility information and 'pointers' to other sources that contain more detail about a certain site. A FINDS search compiles locations from the following sources: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judgments and enforcement cases for all statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket system used to track criminal enforcement actions for all statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System). The FINDS report was last updated 4/14/2010 (search distance - Property).
- The RCRA-NonGen is USEPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. Non-Generators do not presently generate hazardous waste. The RCRA-NonGen list was last updated on 02/17/2010 (search distance ¼ mile).
- The CT DEEP Leaking Underground Storage Tank (LUST) List is a record of tank systems within Connecticut that have reported releases of UST system contents. This list is maintained by the CT DEEP. The LUST list reviewed was dated 11/2/2010. (search distance - ½ mile).
- The UST List is a database of UST systems that are registered in the State of Connecticut and regulated under the Subtitle I of the RCRA and must be registered with the CT DEEP. The UST list reviewed was last updated 12/20/2010. (search distance - ¼ mile).
- The AST List is a listing of bulk petroleum facilities that receive petroleum by a vessel. The list is maintained by CT DEEP. The AST list reviewed was last updated 7/8/2010 (search distance - ¼ mile).
- The SWF/LF database contains an inventory of solid waste management facilities or landfills in the state of Connecticut. These may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills

or disposal sites. The SWF/LF database was last updated on 4/23/2010 (search distance 1.0 mile).

- USEPA Brownfield's database contains an inventory of sites with activity and use limitations and brownfields property addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. The reports are updated semi-annually and the last release was on 12/29/2010 (search distance ½ mile).
- LWDS database (Leachate and Waste Water Discharge Inventory Data Layer) includes point locations digitized from Leachate and Wastewater Discharge Source maps compiled by the CT DEEP. The report was last updated on 7/17/2009 (search distance 1 mile).
- CT Property List (property transfer filings) is a list of sites that meet the definition of a hazardous waste establishment. They can be generators, dry cleaners, furniture strippers, etc. These sites have been sold to another owner. The CT Property List was last updated on 4/23/2010 (search distance target property).
- The Site Discovery and Assessment Database (SDADB) is a database of all sites that have reported to permitting, enforcement, and remediation division where it is suspected that hazardous waste may have been disposed or sites that are eligible for listing on the State Inventory of Hazardous Waste Disposal. The SDADB was last updated on 4/23/2010 (search distance ½ mile);
- The MANIFEST list contains facility and manifest data. The list tracks hazardous waste from the generator through transporters to a TSD facility. The last update to the list was 12/31/2007 (search distance ¼ mile).
- The National Pollutant Discharge Elimination System (NPDES) list includes sites that have a permit issued by CT DEEP. The date of the last update was 1/23/2009 (search distance target property).
- The Voluntary Remediation Program (VCP) includes sites involved in CT DEEP's Voluntary Remediation Program. The last update to the list was 4/23/2010 (search distance ½ mile).

A review of sites which could not be plotted due to a lack of government database information revealed nine listings. None of these sites were identified to be in the vicinity of the Site.

5.2 SITES IDENTIFIED ON GOVERNMENT DATABASES

Trans-Lite was listed in four of the environmental databases including MANIFEST, FINDS, UST and NPDES.

The following table summarizes the regulatory database search of properties within the search radii of the Site. This table only includes programs for which at least one site was identified. Refer to Appendix D (EDR report) for additional information.

Table 5-1
Regulatory Database Search Results

| Database | Site Names Addresses/ EDR Map Identification Number | Potentially Up- or Cross- gradient Site | Direction/ Distance From Property (miles) |
|---|--|--|--|
| CERCLIS- NFRAP (1 site) | WAMPUS MILFORD ASSOCIATES 10/80 WAMPUS LANE I43 | Yes | W 1/4 - 1/2 (0.281 mi.) (neighboring property) |
| RCRA-NonGen (3 sites) | MILFORD TRANSMISSION CORP 324 NEW HAVEN AVE C14 | Not likely | SE 0 - 1/8 (0.121 mi.) |
| | MITCHELL BRADFORD INT L 160 WAMPUS LN. D18 | Yes | E 1/8 - 1/4 (0.149 mi.) (neighboring property) |
| | CT TRANE 363 NEW HAVEN AVE F30 | Not likely | ESE 1/8 - 1/4 (0.182 mi.) |
| RCRA CORRACTS (2 sites) | WAMPUS MILFORD ASSOCIATES 10 WAMPUS LANE/80 WAMPUS I43 | Yes | W 1/4 - 1/2 (0.281 mi.) (neighboring property) |
| | WARNER-LAMBERT SHAVING PRODUCT 10 LEIGHTON ROAD K48 | Not likely | NNE 1/2 - 1 (0.525 mi.) |
| RCRA-TSD (NON CORRACTS) (1 site) | WAMPUS MILFORD ASSOCIATES 10 WAMPUS LANE/80 WAMPUS I43 | Yes | W 1/4 - 1/2 (0.281 mi.) (neighboring property) |
| SHWS (4 sites) | BURNDY CORPORATION 10 WAMPUS LANE I41 | Yes | W 1/4 - 1/2 (0.275 mi.) (neighboring property) |
| | WARNER-LAMBERT 10 WEBSTER RD K49 | Not likely | NNE 1/2 - 1 (0.532 mi.) |
| | MESCO INC. 634 NEW HAVEN AVE M56 | Not likely | E 1/2 - 1 (0.876 mi.) |

Table 5-1
Regulatory Database Search Results

| Database | Site Names Addresses/ EDR Map Identification Number | Potentially Up- or Cross- gradient Site | Direction/ Distance From Property (miles) |
|-------------------|--|--|--|
| | CONNECTICUT AERSOLS, INC. 85 FURNITURE ROW L54 | Not likely | E1/2 - 1 (0.750 mi.) |
| LWDS (9 sites) | BURNDY CORP WAMPUS LANE 26 | Yes | W 1/8 - 1/4 (0.178 mi.) (neighboring property) |
| | BURNDY CORP WAMPUS LANE 39 | Yes | NW 1/4 - 1/2 (0.253 mi.) (neighboring property) |
| | WARNER LAMBERT CORP 10 WEBSTREETER ROAD 51 | Not likely | NNE 1/2 - 1 (0.568 mi.) |
| | BURNDY CORP WAMPUS LANE 52 | Not likely | NE 1/2 - 1 (0.669 mi.) |
| | MESCO 634 NEWHAVEN AVENUE M55 | Not likely | E 1/2 - 1 (0.875 mi.) |
| | BURNDY CORP WAMPUS LANE 58 | Not likely | ENE 1/2 - 1 (0.986 mi.) |
| | SCHICK SAFETY RAZOR 50 | Not likely | NE 1/2 - 1 (0.542 mi.) |
| | CONNECTICUT AEROSOLS INC 85 FURNITURE ROW L53 | Not likely | E 1/2 - 1 (0.750 mi.) |
| | MILFORD HARBOR 57 | Possibly | SW 1/2 - 1 (0.945 mi.) |
| LUST (6 sites) | GUL CITGO 180 NEW HAVEN AVENUE 40 | Possibly | WSW 1/4 - 1/2 (0.269 mi.) |
| | MILFORD ACADEMY 94 EDGEWOOD RD. 42 | Possibly | SW 1/4 - 1/2 (0.276 mi.) |
| | CLOSET ORGANIZERS AND ACCESSOR 245 CHERRY STREET J45 | Not likely | NNW 1/4 - 1/2 (0.430 mi.) |
| | R. ZARGO 85 GOVENORS AVE. 47 | Not likely | WNW 1/4 - 1/2 (0.482 mi.) |

Table 5-1
Regulatory Database Search Results

| Database | Site Names Addresses/ EDR Map Identification Number | Potentially Up- or Cross- gradient Site | Direction/ Distance From Property (miles) |
|--------------------------------------|---|---|---|
| | FORMER CT REFINING CO. 360 NEW HAVEN RD. F24 | Not likely | ESE 1/8 - 1/4 (0.177 mi.) |
| | 374 NEW HAVEN AVENUE 374 NEW HAVEN AVE G33 | Not likely | ESE 1/8 - 1/4 (0.206 mi.) |
| Registered USTs/ASTs (4 sites) | QUICK FOOD MART 305 NEW HAVEN AVE B8 | Yes | S 0 - 1/8 (0.116 mi.) |
| | NEW HAVEN REGISTER/ELM CITY NE 349 NEW HAVEN AVE E21 | Not likely | ESE 1/8 - 1/4 (0.156 mi.) |
| | WAMPUS MILFORD PARK 80 WAMPUS LN H34 | Yes | W 1/8 - 1/4 (0.219 mi.) (neighboring property) |
| | FORMER CONN. REFINING COMPANY 360 NEW HAVEN AVE F25 | Not likely | ESE 1/8 - 1/4 (0.177 mi.) |
| SDADB (7 sites) | NEW ENGLAND SAVINGS BANK 318-322 NEW HAVEN AVENUE C10 | Not likely | SSE 0 - 1/8 (0.117 mi.) |
| | SUNOCO SERVICE STATION 245 CHERRY STREET J46 | Not likely | NNW 1/4 - 1/2 (0.430 mi.) |
| | ELM CITY CITIZEN NEWSPAPERS 349 NEW HAVEN AVENUE E22 | Not likely | ESE 1/8 - 1/4 (0.156 mi.) |
| | BURNDY CORPORATION 10 WAMPUS LANE I41 | Yes | W 1/4 - 1/2 (0.275 mi.) (neighboring property) |
| | DEN TEK INC 158 CHERRY ST 44 | Not likely | NW 1/4 - 1/2 (0.411 mi.) |
| | CLOSET ORGANIZERS AND ACCESSOR 245 CHERRY STREET J45 | Not likely | NNW 1/4 - 1/2 (0.430 mi.) |
| | MITCHELL BRADFORD INT L 160 WAMPUS LN. D18 | Yes | E 1/8 - 1/4 (0.149 mi.) (neighboring property) |

Table 5-1
Regulatory Database Search Results

| Database | Site Names Addresses/ EDR Map Identification Number | Potentially Up- or Cross- gradient Site | Direction/ Distance From Property (miles) |
|--|---|--|--|
| VCP (1 site) | MITCHELL BRADFORD INT L 160 WAMPUS LN. D18 | Yes | E 1/8 - 1/4 (0.149 mi.) (neighboring property) |
| State and tribal Brownfields sites BROWNFIELDS (1 site) | 80 WAMPUS LANE H37 | Yes | W 1/8 - 1/4 (0.219 mi.) (neighboring property) |
| Manifest (18 sites) | Several of the sites are located potentially upgradient (south, southwest) of the Site. The site at 80 Wampus Lane and 160 Wampus Lane are on the MANIFEST list and have the potential to affect the Site based on their close proximity. See Page 8 of the Executive Summary of the EDR report (Appendix D) for details. | Yes | See EDR report |

Based on proximity to the Site and/or the inferred groundwater flow direction (e.g., north, northwest), adjacent properties located south or southwest to the Site are located up-gradient of and have the potential to impact the Site. Also, sites that are listed as directly west or east (cross-gradient) represent potential sources of oil and/or hazardous materials impacts to the Site. Properties located directly north, northeast, or northwest of the Site are “not likely” to affect the Site; however, the closer the site to the subject Site, the more likely the site poses a risk.

Four sites are located potentially upgradient or cross-gradient of the Site and were identified to be a potential concern to the Site as described in subsequent sections below. The other sites listed in Table 5-1 above that are up- or cross-gradient and located more than ½ mile from the Site do not represent a concern to the Site at this time based on the information provided in the EDR Report. The remaining sites listed are considered to be downgradient of the Site and therefore are not considered to pose a threat of a release to the Site based on the information contained in the EDR Report.

5.2.1 Trans-Lite, Inc. – The Site

Trans-Lite Site was identified on the following databases searched: MANIFEST, FINDS, UST,

and NPDES. Details of these listings for the Site along with any other pertinent regulatory documents are described in subsequent sections below.

5.2.1.1. MANIFEST Sites

The MANIFEST list includes facility and manifest data. A manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

A review of the manifest information provided by EDR and obtained from the CT DEEP file review indicates that historically, the Site generated hazardous waste under USEPA ID#CTD001178599. The generator summary report and generator manifest reports (Appendix E) indicate that Trans-Lite disposed of methylene chloride, 1,1,1-TCA, isopropyl alcohol, toluene, amines, flammable liquids, and paint related materials as hazardous wastes.

The information reviewed indicates that on several occasions, over 100 kilograms (220 pounds) of hazardous waste was disposed of during individual shipments. If 100 kilograms (220 pounds) or more of hazardous waste is generated in one month, the Site may qualify as an "establishment" according to the Connecticut Transfer Act.

5.2.1.2. FINDS Sites

Records indicate that the facility applied for and was issued a General Permit to limit Potential to Emit Air Pollutants (GPLPE, or Title V) air permit (1050080GPLPE) for its stationary point sources from its boiler, and its fugitive hazardous air pollutants from two paint spray booths in 1999. In October 2002, a CT DEEP inspector Mark Potash inspected the facility as documented in the Premise Evaluation Report. Mr. Potash concluded that the facility did not require a GPLPE since it had switch to a low VOC coating and had reduced its total paint consumption, and the boiler emissions were below the Title V thresholds. A copy of the historic air permit and supporting documentation is provided in Appendix A.

5.2.1.3. UST Database

According to the EDR report (Appendix D), a 5,000-gallon gasoline UST was removed from the Site. However, based on information and records obtained from the Site contact, the 5,000-gallon

UST was actually a heating oil tank removed in 1989 that was replaced by another 5,000-gallon heating oil UST. Additional information pertaining to these tanks is provided in Section 6.2.1.2.

5.2.1.4. NPDES Sites

Minimal information was supplied in the EDR report for this topic, however, additional records were obtained from the facility.

Wastewater

The facility is required to be current for two wastewater discharge permits: *General Permit for Discharge of Minor Tumbling & Cleaning* and *Minor Printing and Publishing Wastewater*. According to the CT DEEP Wastewater Division, a facility with affected discharges must apply for both permits.

The facility registered for the *General Permit for the Discharge of Minor Tumbling & Cleaning* (GTC000240) in 2003. This general permit was issued under the authority of Section 22a-430b of the Connecticut General Statutes, as amended by Public Act 91-263. The permit program became effective on June 12, 1992 and expires on June 12, 2012.

The facility also registered for the *General Permit for Minor Printing and Publishing Wastewater* (GPP000194) in May 2003, with an expiration date of May 24, 2005. CT DEEP modified and renewed the General Permit on February 15, 2008, which expires on February 15, 2018.

Stormwater

The facility is classified as Standard Industrial Code (SIC) 3647 and the National Industry Classification System Codes 336321, and is required to have a permit for coverage under the *Storm Water General Permit Associated with an Industrial Activity*, storm water discharge permit unless the facility submits and complies with a No Exposure Certification. The facility was issued a baseline industrial storm water permit in 1997, with a renewal in 2003 (GSI000276), expiring October 2007. The facility currently completes annual stormwater sampling.

5.2.2 Wampus Milford Associates 10 & 80 Wampus Lane

The 80 Wampus Lane site located directly west of the Site is listed on numerous databases including CERCLA-NFRAP, RCRA-CORRACTS, RCRA-Non-CORRACTS, SHWS, SDADB,

UST, and Brownfields. A summary of environmental related items for this facility based a review of select documents is provided in this subsection.

The ownership history of 10 and 80 Wampus Lane as documented at the city of Milford Assessor's office is presented in the table below.

**Table 5-2
80 Wampus Lane Ownership**

| Owner | Date | Book/Page |
|--------------------------------|-------------|------------------|
| Burndy Corporation (Burndy) | 01/07/1966 | 0563/289 |
| Framatone Connectors USA, Inc. | 06/03/1996 | 2173/262 |
| FCI USA Inc. | 07/26/1999 | 2362/107 |
| Wampus Milford Associates, LLC | 12/28/1999 | 2388/589 |

This 24-acre property is comprised of two lots, Lot 1 and Lot 2. A manufacturing building is located on the southwest portion of Lot 1, west of the Site. A man-made, earthen drainage swale is present on Lot 2. The drainage swale is approximately 210 feet long by 12 feet wide, with a ponding area and weir. The swale channeled flow to the Stubby Plain Brook, which discharges to the Indian River. Indian River flows south, ultimately discharging to Gulf Pond and the Gulf portion of Long Island Sound. The drainage swale received treated plating wastewater and stormwater run-off from the Burndy site between 1965 and 1991. The remainder of this property is located adjacent to the north of the Trans-Lite Site. Stubby Plain Brook forms the northern property boundary of Lot 2.

Burndy owned and operated this property beginning in 1956, for the manufacture of electrical components and accessories. Operations included rubber and plastic molding, operation of power presses, screw machining, degreasing, plating, wastewater treatment, soldering, assembly, and shipping. Metal hydroxide sludges from the treatment of wastes generated by electroplating were accumulated in two on-site surface impoundments (lagoons) and disposed of in an on-site landfill. As an example of their annual wastewater generation, the plant generated approximately 212,305 gallons of industrial wastewater in 1975. Industrial waste treatment included the use of two settling tanks and the two lagoons.

Known spills that occurred at the site included No. 6 fuel oil; cyanide to the waste lagoons; and nitric acid and water solution. The site also had several USTs including two 15,000-gallon No. 6

fuel oil USTs and a 5,000-gallon No. 4 fuel oil UST that was abandoned in place in 1970. Records indicate that all USTs were removed from the site (Appendix E).

Framatone Connectors International (FCI) purchased the Burndy property in 1989. In 1993, all operations at the facility ceased. In 1995, the company name was changed from the Burndy Corporation to Framatone Connectors USA (Framatone). From 1985 to 1997, Burndy/Framatone/FCI performed environmental investigations and remediation at the site, including, but not limited to, closure of the two metal hydroxide sludge lagoons, periodic post-closure groundwater monitoring, excavation and disposal of the major portions of an historic metal hydroxide sludge landfill, and comprehensive site-wide investigations, including work conducted under the Voluntary RCRA Corrective Action program. Quarterly groundwater monitoring was performed at the site between 1984 and 1997, and semi-annual groundwater monitoring has continued since.

A 1998 site investigation conducted by HRP on behalf of Framatone revealed that the drainage swale sediments contained elevated levels of metals exceeding RSR Industrial/Commercial (I/C) Direct Exposure Criteria (DEC). According to documents obtained from CT DEEP, a RCRA Facility Investigation voluntary Corrective Action Work Plan prepared by HRP for Framatone identified areas of the site where potential releases had occurred.

In 1999, ownership of the site was transferred to the partners of the Wampus Milford Associates (WMA). This transfer of property triggered the Connecticut Property Transfer Act. This program requires the owner to fully assess, investigate, and remediate the entire property. FCI notified both USEPA and CT DEEP of the transaction, and WMA's acceptance of the environmental obligations post-closing and agreement to perform investigation and remediation of the property. WMA submitted a CT DEEP Environmental Condition Assessment form (ECAAF) in December 1999.

In 2000, an illicit dumping incident occurred at this site. Waste was dumped around groundwater monitoring wells and close to Stubby Plain Brook. A quick response by WMA and its contractors prevented the dumping from becoming a serious environmental release.

WMA continued environmental investigations and remediation, focusing on the developed portion of the site. However, little progress was made towards stabilizing conditions within the

drainage swale. Metal hydroxide sludges that were landfilled on site were removed from the site landfill in 2002. On October 7, 2002, the USEPA informed WMA that the 80 Wampus Lane site achieved the federal Environmental Indicator Goal: *Migration of Contaminated Groundwater Under Control*. This was considered an interim goal, and final remedy was still required.

In 2003, Environmental Resources Management, Inc. (ERM) submitted a Semi-Annual Groundwater Monitoring Report for the WMA site, which summarized the data from 1997 until 2003. Chlorinated VOCs (PCE and TCA, and their degradation products) petroleum hydrocarbons, semi-volatile VOCs, and non-chlorinated VOCs, cyanide, and metals (beryllium, cadmium, chromium, copper, lead, nickel, silver, and zinc) were present in the groundwater. The 2003 report indicated that impacts to soil and groundwater occurred in many of the AOCs, and most of the impacted areas had been remediated, or delineated and were to be addressed through the placement of Environmental Land Use Restrictions (ELURs) on the site. With the exception of AOC-1 (drainage swale), the larger AOCs, which represented potential significant ongoing sources of groundwater contamination, including the former landfill, surface impoundments and the waste line network have been characterized and remediated completely.

In 2004, CT DEEP began acting as the lead agency overseeing the investigation and remediation activities at the 80 Wampus Lane site. CT DEEP contacted the USEPA RCRA Corrective Action Section due to the lack of response by WMA to remediate the drainage swale on Lot 2. In 2005, USEPA outlined the expectations for the work to be performed by WMA, and required that the remediation of the drainage swale be completed by June 30, 2005. On March 5, 2005, CT DEEP notified WMA the site-wide investigation and remediation were behind schedule, and that a new schedule and summary of investigations conducted to date were expected to be submitted. The CT DEEP also required WMA to conduct an ecological risk assessment.

In 2006, WMA subdivided the property designating as Lot 1, the improved portion of the property, and designating as Lot 2, the unimproved portion of the property, which includes the drainage swale. WMA sold Lot 1 to a related party, JMG Realty LLC. A Form III certification for the transfer of the site, or portions thereof, were received by CT DEP on February 7, 2006 and May 11, 2006, with the certifying party being Edward Lapidus, representing various Lapidus Family Trusts and/or WMA.

On August 2, 2006, WMA sent a letter to USEPA stating that WMA did not have any additional funds to complete a cleanup of the drainage swale. As a result, in December 2006, USEPA's Superfund Technical Assessment and Response Team III (START) (Weston Solutions, Inc.) collected 63 surface soil samples, 17 subsurface soil samples, and 3 sediment samples for metals, hexavalent chromium, and PAH analysis. Additionally, the surface soil samples collected from the center line of the drainage swale were analyzed for polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH). The analytes that exceeded the I/C DEC in one or more surface and/or subsurface soil samples included the following: benzo(a)pyrene; benzo(b)fluoranthene; benzo(a)anthracene; beryllium; and lead. Nickel exceeded the Consensus-Based Freshwater Sediment Benchmarks TECs in two sediment samples collected from Stubby Plain Brook. The START site investigation was closed on March 2, 2007, with the recommendation that a time-critical removal action be conducted.

In 2007, approximately 1,000 tons of contaminated soils were excavated from the drainage swale. Approximately 260 tons of these soils were classified as characteristically hazardous waste (cadmium). On April 24, 2008, USEPA documented the completion of the cleanup activities at the WMA site. Quarterly on-site inspections for up to one year are required to evaluate the condition of restored swale area and the vegetative cover transition from EPA to CT DEEP, and the EPA Removal Program's involvement at the site will be concluded.

On behalf of JMG Milford Realty, LLC, ERM submitted a Site Investigation and Remediation Status Report on March 6, 2008. The report described a conceptual site model based on the assessments and investigations conducted at the Burndy site from 2000 through 2007 by various consultants, including ERM. To refine the conceptual site model, ERM conducted additional investigative activities between 2005 and 2007. ERM documented the status of each AOC at the Burndy site in the *Site Investigation and Remediation Status Report* dated March 6, 2008 and concluded that the AOCs have been fully characterized and remediated where required. The report indicates that as of 2003, groundwater at the site contained cadmium and chlorinated VOCs at concentrations exceeded the SWPC and/or the Volatilization Criteria (VC), but that the concentration of copper and cadmium in groundwater dropped over the 1993 to 2003 time period. ERM considered the downward trends in contaminant concentrations (1993 – 2003), the remediation of the landfill and other site AOCs, and absence of metals and VOCs above SWPC in the Stubby Plain Brook, to conclude that application of an ELUR and groundwater monitoring was required for the site.

5.2.3 160 Wampus Lane

This site located directly east of the Site at 160 Wampus Lane and is listed on the SDADB and the VCP lists. A summary of environmental related items for this facility based a review of select documents is provided below.

Historically, this facility blended chemicals into finished products used in the metal finishing industry. Chemicals used in this facility included copper sulfate, nitrates, and potassium cyanide. A 1,000-gallon AST was used to store mineral spirits that was used to blend chemicals. No. 2 fuel oil was stored in two, 550-gallon USTs. Facility equipment cleaning wastewater was discharged to an on-site dry well located at the northwest portion of the property.

The CT DEEP ordered the site to investigate and identify remedial actions associated with on-site wastewater disposal, to install processes to treat/dispose of wastewaters from the manufacturing processes, and to reduce/eliminate contamination from wastewater disposal. F&O reported that based on CT DEEP correspondence, the site was brought into compliance.

F&O completed a limited Phase II ESA (F&O, 1996) and a Phase I ESA (F&O, 1997) to determine whether potential release areas were evident on the property. F&O completed 25 soil borings, converting five of them to monitoring wells. The locations of the soil borings and monitoring wells were selected to assess the two fuel oil USTs, a septic system, floor trenches within the building, dry well, and area of a former AST and its containment structure. Soil and groundwater samples were collected. F&O reported the groundwater flow direction as to the north, northwest towards the wetlands. The soil data indicated petroleum products and metals (arsenic and chromium) and the groundwater data showed concentrations of copper and cyanide above applicable SWPC. On behalf of IMF Realty Milford, Environmental Products & Services, Inc. (EPS) completed a Remedial Action Report in December 1997.

The following summarizes the investigative and remedial activities conducted by F&O and EPS.

- An integrity test was conducted on one of the two 550-gallon petroleum USTs, and it passed. Due to the location of the tank in proximity to the building, the tank had to be abandon-in-place.

- The second 550-gallon petroleum UST was removed with soil samples collected. Analytical results indicated that a release of petroleum had occurred. Impacted soils were excavated, confirmatory samples collected, and the tank disposed of offsite.
- The AST had been removed previously. The remaining concrete foundation and containment walls, located on the northeast corner of the facility, were demolished in October 1997. The soils beneath the foundation were excavated to groundwater (5 to 6 ft bgs) to remove impacted soil. The majority of impacted soils were removed, but some remained beneath the concrete foundation footer at the northeast corner of the building. A soil venting system was installed at the base of the foundation to remediate the small volume of remaining contaminated soil.
- Leachable concentrations of chromium, and cyanide were detected in soils from the dry well area. Several excavation events were completed to remove approximately 100 tons of soil. Results of confirmatory soil sampling indicated remaining soils within the dry well and leach field were compliant with RSRs.
- The soil beneath the concrete-lined trenches inside the building contained metals (arsenic, cadmium, chromium, and lead) exceeding applicable RSRs, but was left in place and an Environmental Land Use Restriction (ELUR) recommended in lieu of excavation.
- Other areas at the site (roof drain spouts, loading dock) were excavated to remove contaminated soils. Sampling results indicated concentrations of contaminants were below applicable RSRs.
- Groundwater sampling showed cyanide and dissolved metals (arsenic, chromium, and copper) above RSR SWPC beneath this site. Samples collected downgradient of the Mitchell Bradford site (on the Burndy property) showed no dissolved arsenic or chromium, however, cyanide was present above RSR SWPC. PCE, ethyl benzene, and xylenes were also detected in groundwater in the vicinity of the AST containment area. TCA was detected in monitoring wells on the western portion of the Mitchell Bradford property.

In 1998, IMF Realty Milford submitted an ECAF. The form listed the site as a former RCRA LQG until 1994, and that it had been vacant for the last seven years (1990-1997). The ECAF listed releases reported to CT DEEP in the late 1970s/early 1980s including chlorine (1979), sodium cyanide (1979), corrosives (1980), and sodium bisulfide (1982). According to information presented by F&O, as of 2001, the corrosives and sodium bisulfide spills were not closed within the CT DEEP system.

F&O reported that a Transfer Act Form IV was filed in 1999 for the Mitchell Bradford site. The verification stated that contamination on the site had been fully delineated and all potential sources had been identified. CT DEEP rejected the verification since the cyanide plume had not been fully characterized, and that cyanide did not originate at an upgradient source.

5.2.4 Gulf Citgo, 180 New Haven Avenue

This site is listed on the LUST list. Details contained in the EDR report indicate that a release may have occurred due to an overfill that occurred on February 24, 2010. No other pertinent information was available from the listing.

5.2.5 Milford Academy, 94 Edgewood Road

This site is listed on the LUST list. The EDR report indicates this site had a release of less than 2,100 gallons of commercial heating fuel on December 5, 1994. The status of this release is completed; therefore, this site does not appear to represent a significant environmental concern for the Site at this time.

5.3 REGULATORY DOCUMENTS

AMEC conducted a review of public files maintained at the offices of the CT DEEP in Hartford, Connecticut. Identified, available files pertaining to the Site maintained by the Waste Management Bureau and Water Management Bureau were requested.

The Waste Management Bureau maintains RCRA files including various facility documents, permits, notice of violation, orders, complaints, correspondence, and groundwater monitoring reports. Solid waste facility files maintained include engineering drawings and maps, landfills and volume reduction plans, water quality data, and special waste authorization information. UST Program files are also maintained by the Waste Management Bureau and include inspection reports, notification forms and variance requests.

The Water Management Bureau maintains files for discharge permits, monitoring, correspondence, reports, and orders for the following programs: Groundwater; Industrial Discharges; Subsurface Disposal; Superfund (state and Federal); Property Transfers; and Urban Site Remediation. P-5 Industrial Audits were also requested. The P-5s are CT DEEP inspection reports of manufacturing facilities that were conducted during the 1970s and early 1980s.

Relevant information identified in the CT DEEP file review is included in previous report subsections.

6.0 SITE CONTACTS, CURRENT AND HISTORICAL SITE USES, AND REVIEW OF FACILITY RECORDS

AMEC conducted interviews with knowledgeable persons and reviewed facility records and mapping, as available. Information obtained from facility personnel and review of documents and maps is provided below or has been incorporated in appropriate Sections of this report.

6.1 SITE CONTACTS

The primary facility contact for completion of this Phase I ESA is Mr. William Maley, Jr. (Mr. Maley). The Site inspection and interview were conducted on February 1, 2011, with subsequent contact during the week of February 12, 2011. The results of the inspection and interview are included in subsequent sections below.

6.2 CURRENT SITE USE

Based on information from City of Milford files, the Site building is approximately 54,840 square feet. The City of Milford Assessors property sheet (Appendix A) indicates that building was constructed in 1950. Identified significant historical uses of the property which differ from the current uses of the property are discussed in Section 6.3 below.

Trans-Lite manufactures lighting for many types of subway and rail cars. The facility purchases aluminum and steel sheet metal and stock and therefore does not conduct foundry or casting operations at the Site. A large portion of the Trans-Lite operations include assembly of the lights with fabricated metal pieces and plastic or glass lenses. Metal from the suppliers is cut, machined, polished, and welded in the sheet metal fabrication area (Figure 3).

According to the Site contact, in 1979, Trans-Lite acquired J. Burdon, Inc., a manufacturer of gundrills located in Wallingford, Connecticut. J. Burdon moved into the Site at that time and began manufacturing gundrills that are used for deep hole drilling operations. Gundrills are straight fluted drills used for deep hole drilling of metal, which allow cutting fluid to flow through the drill's hollow body and onto the cutting face. The gundrill operations include grinding, cutting, and sharpening of metal stock. J. Burdon is a division of Trans-Lite.

The southern section of the building contains a mezzanine which includes office space and the facility sheet metal operations. The later additions to the building comprise the lower level main plant. The current layout of the facility is provided in Figure 3 and includes the following areas:

- J. Burdon & screw machine department
- finishing department
- J. Burdon Gundrill
- spot welding, drilling, and cut off
- assembly areas
- warehouse storage
- shipping / receiving
- silk screen department
- sheet metal
- parts washing room
- office and engineering

According to the Site contact, much of the operation at the Site is assembly which occurs on the main plant floor. Very little silk screening and painting is done at the facility, and little hazardous waste is generated as part of facility operations.

A list of current chemicals used in the facility is included in Appendix B. These include small quantities of cleaners (isopropyl alcohol, acetone), oils and greases used in the machines, ink, paints, and raw sheet metal and metal stock. Chemical and waste storage was observed in the assembly area located in the northern central area of the main plant (Figure 3). According to the Site contact, rags dampened with isopropyl alcohol are used throughout the main floor departments and sheet metal area for parts cleaning. Used rags are stored in closed, labeled, metal containers throughout the main plant floor.

Parts are wiped with rags dampened with isopropyl alcohol. Used rags are placed into covered containers for cleaning or disposal. The most recent hazardous waste shipments include cutting oil waste, isopropyl alcohol (rags / liquid), and acetone.

Dust from grinding operations conducted at the facility is captured by the dust collection system, which is located in the gundrill area on the southeast corner of the main plant floor. According to the Site contact, stainless steel grinding dust gets recycled.

AMEC observed containers of various oils throughout the main plant floor. Surficial staining was observed in the vicinity of machines (e.g., presses). These stains appeared to be superficial in nature, and since no open floor drains are present in the facility, these minor spills do not represent a significant environmental concern.

Overhead doors are present on eastern and northern sides of the building (Figure 2). An elevated loading dock is present at the southeastern end of the building near the sheet metal area.

The following specific features were evaluated for their potential to create for environmental concern at the Site.

6.2.1 Storage Tanks

Based on available information, the Site has four ASTs and two underground storage tanks. Discussion of specific, select storage tanks is provided below.

6.2.1.1. Above Ground Storage Tanks

The facility has four ASTs, referred to as dip tanks by facility personnel, which are located in the parts washing room near the Burdon Gun Drill area. These tanks contain water/soap solution wash water and rinse water which is used to clean parts. The soap solution contains a chemical Green Soak Cleaner 500 that is permissible to be discharged to the publically owned wastewater treatment (POTW). Rinse water that can no longer be reused in the parts cleaning process is discharged as wastewater. The facility has a General Permit for the Discharge of Minor Tumbling or Cleaning of Parts Wastewater. The wastewater is collected in the underground 2,000-gallon pump tank and held to allow solids to settle to the bottom of the tank.

A black iron pipe with a screw on cap was observed sticking out of the concrete floor in the area in front of the dip tanks (see Appendix C, Photographs). The origin and the purpose of this pipe are unknown.

6.2.1.2. Underground Storage Tanks

Two USTs exist at the Site. One 5,000-gallon heating oil UST is located near the southeast area

of the building as shown on Figure 2. This storage tank was installed in 1989 as a replacement for the original heating oil tank believed to have been installed when the initial building was constructed in the late 1950s. According to information reviewed, the tank was installed in August 1989, at which time the old tank was removed. A letter dated August 30, 1989 from Trans-Lite to CT DEEP indicated the tank removal process was in accordance with CT DEEP specifications and with Milford Fire Marshall inspection and approval. A letter dated August 24, 1989 from Charles B. Waterman Company to the CT DEEP provided results (4.7 mg/kg) for a composite of five soil samples collected from the "tank grave." Although the letter did not indicate the analytical parameter, it is likely the analysis was for TPH. Based on the available information, it does not appear that a release occurred from the historic tank. Copies of available documents are included in Appendix B.

According to Mr. Maley a sewer pump tank was installed on the eastern side of the Site beneath the parking area in 2002 to replace the original septic system tank when the facility applied to the city to discharge wastewater to the POTW. Prior to that time, wastewater discharged to the septic system. Copies of the excavator's proposal for abandonment of the historic septic system and installation of a 2,000-gallon pump station UST and the Board of Sewer Commissioners approval for the sewer connection are included in Appendix B. Records from the Milford Engineering Department confirm the capacity of the sewer pump tank (Appendix A).

6.2.2 Chemical and Materials Handling

The following section discusses the current and known historical chemical and waste materials storage and handling practices at the property. Materials contained in ASTs and USTs are discussed in Section 6.2.1.

The Site operates two forklift trucks; one powered with propane and one electric. The propane cylinders are stored in a caged area on the north side of the building (Figure 2).

The facility operates an oven at approximately 150°F, which is used to test the electrical conductivity of components.

6.2.2.1. Chemical Storage

Mr. Maley provided a current list of the chemicals used in the facility (Appendix B). Typically, these materials are purchased in small quantities and stored in containers on top of secondary containment or in fire-rated storage cabinets. These materials are used in the work areas in small quantities. Materials safety data sheets (MSDSs) are maintained for the materials used at the facility.

Hazardous chemicals and wastes were observed throughout the main plant floor. In the assembly area, AMEC observed several 55-gallon drums of isopropyl alcohol, containers of acetone, waste isopropyl alcohol, and waste TCE stored on top of portable secondary containment (see Appendix C, Photographs).

According to Mr. Maley, silk screening operations have been reduced over the years, with the majority of painting being done off Site by others. The facility has one paint booth, which it operates very infrequently. The booth is located in the former painting area (marked as unused area on Figure 3) on the southern end of the main plant floor. The paint booth is equipped with particulate filters. When spent, these filters, and any empty paint cans, are accumulated and disposed of as solid waste in the dumpster located at the northeast corner of the building.

Signs are silk screened in the western area of the main plant (Figure 3). Silk screening inks are stored in flammable cabinets. The silk screening process involves applying a cleaner (e.g., isopropyl alcohol) to remove excess silk screening paint or ink screens. The cleaner drains into a trough that discharges to a holding tank located on interior concrete flooring (Figure 3, and Appendix C, Photographs). The cleaner is recycled and back to the scrub brush for reuse. When the cleaner becomes too dirty to reuse, it is collected and disposed of off Site by a licensed waste hauler. The sludge/sediment from the cleaning process that settles in the bottom of the holding tank and trough is removed by a licensed waste hauler. AMEC observed staining on the concrete in this area.

The facility uses oil for lubricating and cooling the drilling, punching, and cutting machines. Containers of oil were scattered throughout the main plant. A container of Fuel Rite (UN1255), a chemical added to heating oil to make the oil flow, was observed near the back door of the facility. The facility disposes of empty oil containers in the solid waste dumpster.

6.2.2.2. Waste Handling and Management

According to Mr. Maley, the facility currently generates very little hazardous waste, which is collected in small labeled containers throughout the main plant area. Appropriate off-site disposal of the wastes is then coordinated and removed by a licensed waste hauler. The types of waste materials and approximate quantities that have been generated at Trans-Lite from January 1, 1984 through December 31, 2005 are listed in the EDR report (Appendix D) and the CT DEEP generator summary and manifest reports (Appendix E). Based on these records, the facility has not shipped any hazardous waste since April 2004. During the Site reconnaissance, AMEC observed the containers labeled waste trichloroethylene and waste isopropyl alcohol.

One small open-top, unlabeled container was present at the Shipping and Receiving area. Mr. Maley believed that the brown liquid in the container was actually from a cigarette snuffer, and not oil.

6.2.3 Heating/Cooling Fuels and Chemicals

The Trans-Lite facility is heated by space heaters in the main plant area powered by a boiler that can be operated by No. 2 fuel oil or natural gas. During the time of the Site visit, the facility was using natural gas.

6.2.4 Solid Waste

Refuse generated at the facility is collected for off-site disposal in a dumpster located at the northeastern side of the building. This dumpster is also used to dispose of empty oil containers, paint booth filters, and grinding dust.

Low quality scrap metal is stored outside in a dumpster located on the southeast corner of the building near the elevated loading dock and the sheet metal department (Figure 2). Stainless steel and other higher quality metal scrap are collected for recycling in clean, 55-gallon drums inside the facility.

Wood pallets and scraps are collected for recycling in an open top dumpster positioned on the eastern side of the building. A couple pallets were also observed next to the dumpster. According to Mr. Maley, old fluorescent light ballasts from lighting in the facility were recycled.

It is important to note that due to the presence of snow on the ground, AMEC could not observe the ground conditions with respect to staining in the vicinity of these areas or on other portions of the site.

6.2.5 Sewage Disposal/Septic Tanks

According to a previous F&O report, sanitary wastewaters discharged to an on-Site septic system. The leach field for the main septic system was located on the east side of the Site under the paved areas. Two dry-wells that were used to collect excess gray water from the main septic system were located south of the building. F&O also reported a small septic system located on the west side of the building that served two bathrooms.

The City of Milford Board of Health records indicate that the Site had a private septic system into which sanitary wastes and wastewater were discharged. Records indicate the septic system was repaired in 1975 (Appendix A). After 2002, the Site applied for a permit to discharge its wastewater to the City of Milford POTW system. Wastewater is collected in the 2,000-gallon sump tank that contains a pump (Figure 2), which pumps the wastewater at a low flow rate to the main line on Wampus Lane. Historically, wastewater from the silk screen wash discharged to the septic system. This wastewater is now captured in small silk screen holding tank and disposed of off Site.

6.2.6 Hydraulic Equipment

The facility has hydraulic presses. Evidence of spills was observed around multiple machines (see Appendix C, Photographs). Near one press, oily absorbent was present.

6.2.7 Electrical Transformers

Three pole-mounted transformers were observed on the eastern side of the Site (Figure 2). The Site is not aware of and AMEC did not observe PCB containing transformers at the property.

6.2.8 Water Supply and Wells

The Site receives potable water from the South Central Connecticut Regional Water Authority. No water supply wells have been identified at the Site. Based on available documents, monitoring wells are present on Site and several monitoring wells were observed inside the facility during the Site reconnaissance.

According to the EDR report (Appendix D), a Public Water Supply well is located ½ to 1 mile west of the Site. However, the information contained in the report does not indicate the status of the well nor the reported population it serves.

6.2.9 Drains, Sumps, Pooled Liquids, and Pits

Historically, floor drains were located in the building and discharged either to the ground or to the on-Site septic system. However, according to Mr. Maley, all drains have been sealed. AMEC did not observe any open floor drains, sumps, or pooled liquids during the Site reconnaissance.

The parts washing room, which is where the four dip tanks are located, has a concrete pit used for the storage and containment of fluids associated with cleaning parts. Mr. Maley indicated that the pit is the location of the former solvent vapor degreaser. No other pits were observed at the Site.

6.2.10 Stained/Corroded Surfaces

Surficial staining was observed during the AMEC Site reconnaissance of the facility's production areas. Oily staining was observed near presses and in the work shop on the concrete floor. In one area, absorbent that was placed to contain an oil spill was observed. Paint staining on the floor and the wall in the vicinity of the silkscreen trough indicates that spills or splashes from the trough have occurred.

Around the exterior of the building, AMEC was not able to observe most of the ground surface for staining, due to the presence of snow.

6.2.11 Stressed Vegetation

Snow was present on exterior areas of the Site; therefore, observations of stressed vegetation could not be conducted during the Site reconnaissance.

6.2.12 Odors

No unusual odors were noted during the Site reconnaissance.

6.3 SITE HISTORY AND HISTORICAL ACTIVITIES

According to Mr. Maley, Trans-Lite began operations in 1959 when his father and a partner purchased the Lighting Division of Safety Industries, Inc. Information from Mr. Maley and/or contained in historic reports indicates the following historical activities/process/equipment:

- An underground water tank that served a former water-cooled air conditioner west of the building is no longer in use.
- Rinseate from a parts cleaning process formerly discharged into a drainage pit in the floor in the parts washing room.
- A floor drain (now sealed) was located in the former paint area.
- A former solvent vapor degreaser was located in the parts washing room.
- Wastewater from the silk screening washer formerly drained to the on-Site septic system.
- A small septic system that served two bathrooms was located west of the building.

7.0 CONCLUSIONS

Based on the findings of this Phase I Environmental Site Assessment of the Trans-Lite facility, AMEC offers the following conclusions.

7.1 SUMMARY OF ON-SITE FINDINGS

The 2.07-acre property at 120 Wampus Lane in Milford, Connecticut is currently owned and operated by Trans-Lite. The property is currently and has been almost exclusively used to manufacture safety lighting for rail cars and buses since its construction in 1950. Prior to that time period, the property was undeveloped. During subsequent years, additions to the building were construction as described previously in this report. The exterior portions of the Site are mostly paved roadways and parking areas, with landscaped areas bordering the building. Storm water enters the Site storm drain system, which discharges to a swale on the northeast corner of the Site.

The Site is currently connected to the municipal sewer system but wastewaters were formerly discharged to the on-Site septic tanks and leaching fields. Relatively small amounts of petroleum products and hazardous materials are used and stored at the Site. Over the years, the facility has reduced the amount of hazardous waste it generates. The Site uses one UST located on the southeast corner of the Site to store up to approximately 5,000-gallons of heating oil. Another UST is used as a pump-out tank for site sanitary and process wastewater.

The Trans-Lite facility is listed on a several environmental databases including the following: MANIFEST; FINDS; NPDES; and UST.

Historically, the facility used chlorinated solvents in a vapor degreaser within the parts washing room. The Site had a release to soil and groundwater apparently through a drainage pit within the parts washing room. Several Site investigations have been completed along with remedial measures completed in a portion of the parts washing room.

AOCs have been identified for the Site and are provided below in Section 7.3 with documentation of the rationale for each provided in appropriate Sections of this report.

7.2 OFF-SITE

The Site is located in an area of mixed industrial, commercial and residential use as described previously in this report.

The EDR database review report and information obtained from previous reports indicates that several off-site properties in the Site vicinity have documented and potential soil and groundwater contamination. The former Burndy Corporation at 80 Wampus Lane is the neighboring property located to the west and north of Trans-Lite, and the former Mitchell Chemical Corporation at 160 Wampus Lane is the neighboring property located to the east of Trans-Lite. A long history of environmental investigation and some remediation has occurred at each property and according to documentation reviewed, neither property has been fully relieved of its environmental requirements, however, it should be noted that significant progress has apparently been made.

7.3 AREAS OF CONCERN SUMMARY

Based on the review of information made available to AMEC or obtained during the assessment of the subject property, the following AOCs have been identified for the Site.

Table 7-1
Summary of Site AOCs

| Name | Description |
|--|--|
| AOC 1 - Parts Washing Room | This room formerly contained a former solvent-based vapor degreaser and a former floor drain. There is also a subgrade pit located in the room and chemicals were formerly stored in the room. |
| AOC-2 – Former and Current Heating Oil UST | A 5,000-gallon fuel oil containing UST is located to the south of the building. The current UST replaced a former fuel oil containing UST at the same location. |
| AOC-3 – Historic Septic Systems | Septic systems were formerly located to the east and west of the building. The main septic system was located to the east of the building and formerly received wastewaters from Site processes. |
| AOC 4 – Paint Room | Paint is stored and applied in this room. A paint booth is currently located within the room and a second paint booth was formerly located in the room. |
| AOC 5 – Silk Screen Department | Silk screening is completed within the west central portion of the building. Paints are stored and used in this area along with solvents. |
| AOC 6 – Hazardous Materials Storage | Hazardous materials are stored in a small area within the central portion of the building. |
| AOC 7 – Shipping and | Shipping and receiving is located at the northeast corner of |

| | |
|--|--|
| Receiving, Former Hazardous Waste Storage and Solid Waste Dumpster | building and includes loading docks. A hazardous waste storage area is located within the shipping and receiving area and a solid waste dumpster is located adjacent to the loading docks. |
| AOC 8 - Loading Docks | In addition to shipping and receiving, loading docks are located at the southeastern portion of the building and along the rear, northern edge of the building. |
| AOC 9 - Stormwater System/Drainage Swale | A drainage swale is located northeast of the building and receives the majority of the Site's stormwater and potentially former Site wastewaters. |
| AOC 10 – Off-Site Concerns | Neighboring properties to the west (80 Wampus Lane) and east (160 Wampus Lane) have documented and potential soil and groundwater contamination. |

8.0 LIMITATIONS AND RESTRICTIONS

The findings and opinions presented are relative to the dates of AMEC's Site work and should not be relied on to represent conditions at substantially later dates.

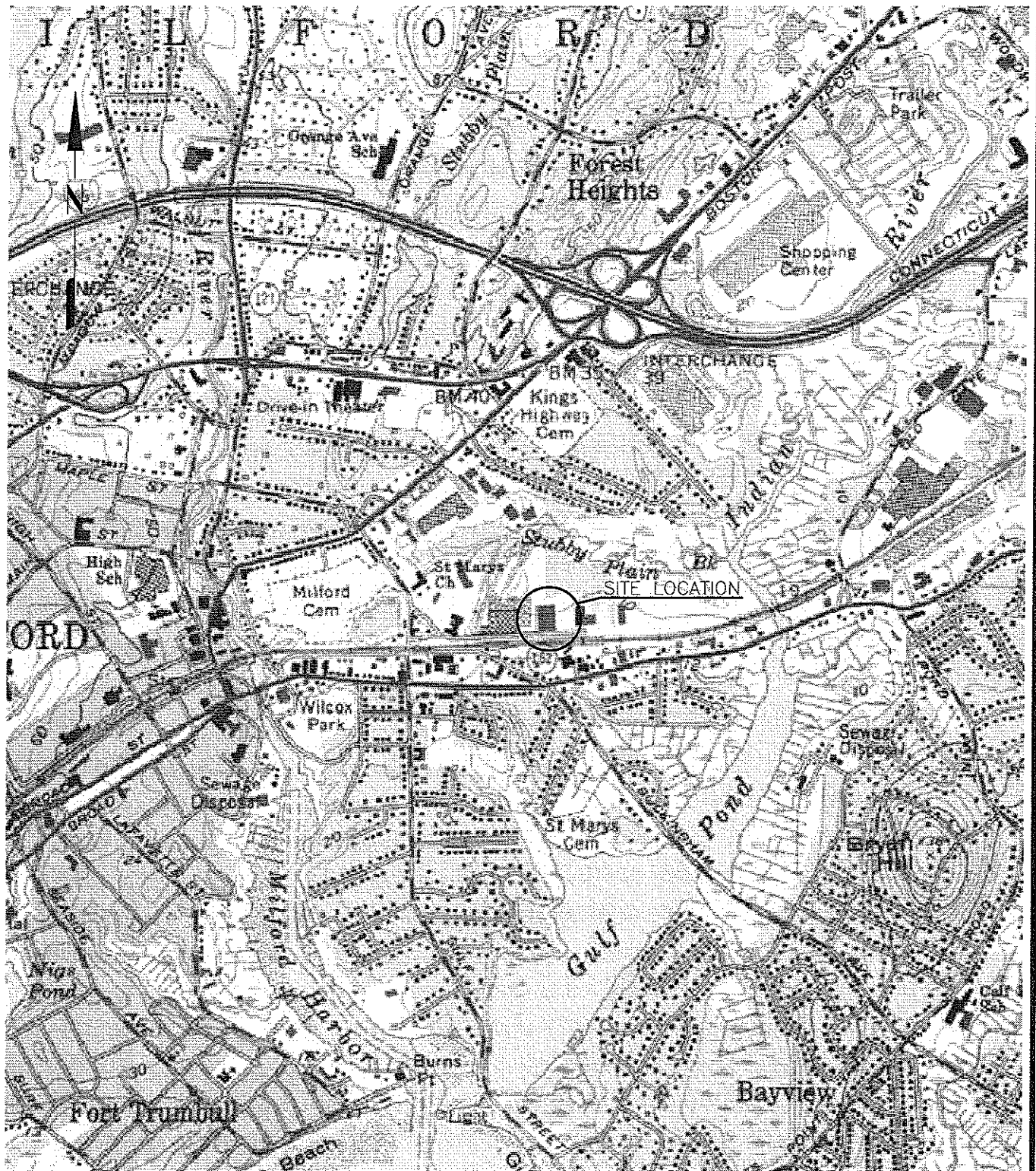
The opinions included herein are based on information obtained during the assessment and our experience. If additional information becomes available which might impact our environmental conclusions, we request the opportunity to review the information, reassess the potential concerns, and modify our opinions, if warranted. If this assessment included a review of documents prepared by others it must be recognized that AMEC has no responsibility for the accuracy of information contained therein.

Although this assessment has attempted to identify the potential for environmental impacts to the subject property, potential sources of contamination may have escaped detection due to: (1) the limited scope of this assessment, (2) the inaccuracy of public records, and (3) the presence of undetected or unreported environmental incidents, (4) inaccessible areas and/or areas covered by snow/ice, and/or (5) deliberate concealment of detrimental information. It was not the purpose of this study to determine the actual presence, degree or extent of contamination, if any, at the Site. This would require additional exploratory work, including sampling and laboratory analysis.

This report is intended for the use of Trans-Lite only, subject to the contractual terms agreed to for this project. Reliance on this document by any other party is prohibited without the express consent of Trans-Lite and that party's execution of mutually agreeable terms and conditions with AMEC. Use of this report for purposes beyond those reasonably intended by Trans-Lite and AMEC will be at the sole risk of the user.

By issuing this report, AMEC does not represent or warrant that Trans-Lite or any other entity will qualify for any legal defense to any liability under the Comprehensive Environmental Response, Compensation and Liability Act (42 U.S.C. §9601 et seq.) or under any other law or regulation pertaining to the property.

FIGURES



Base map source: MAPTECH, USGS Topographic Series. Connecticut complete state coverage CD. Edition 2.0 MILFORD quadrangle, photorevised 1984.

Prepared/Date: JVM 11/15/11
Checked/Date: JRY 11/15/11

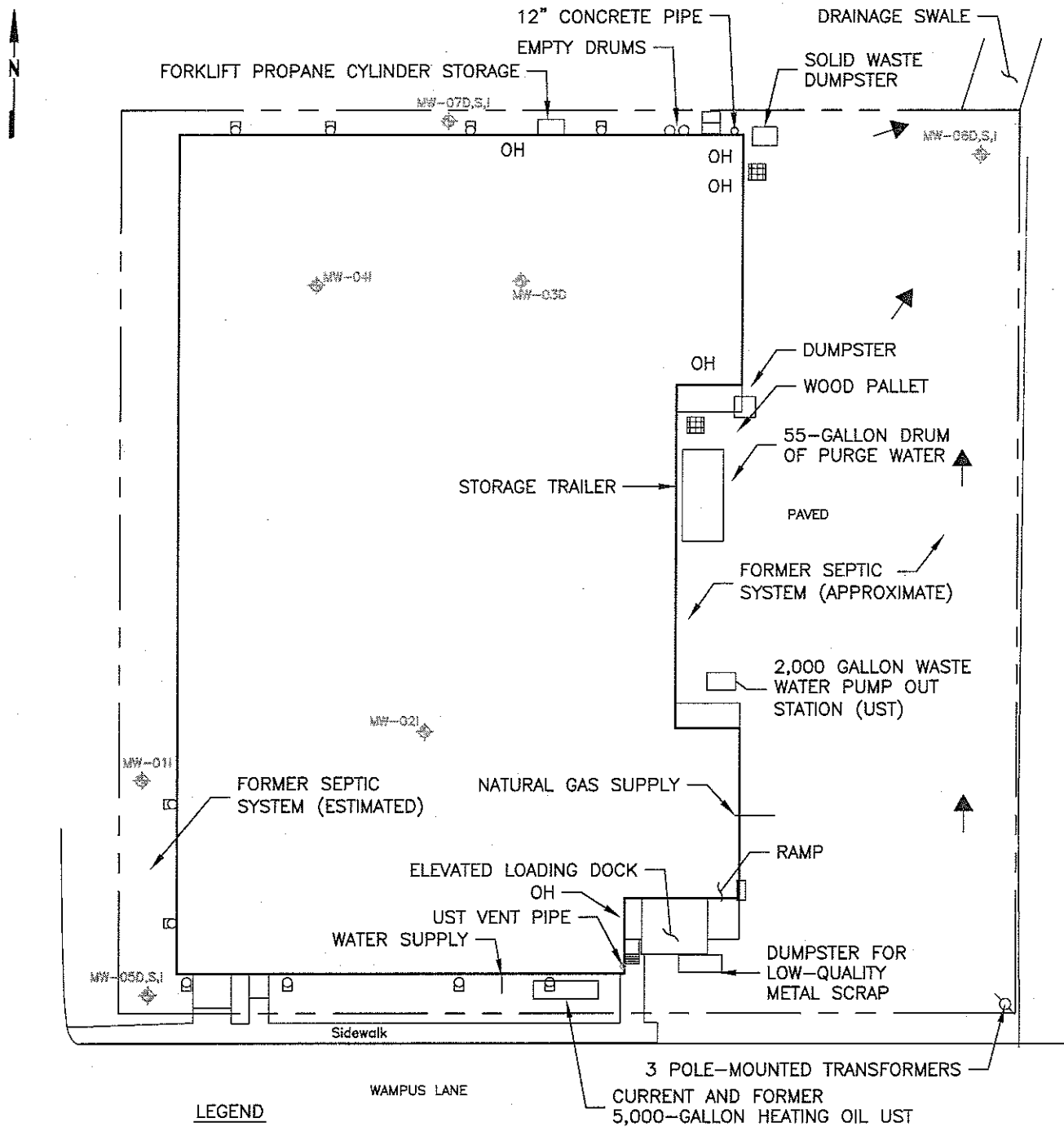
Not to scale

Trans-Lite, Inc.
120 Wampus Lane, Milford CT

amec

Site
Location Map
Project 3610-11-0095
Figure 1

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- LEGEND**
- OH OVERHEAD DOOR
 - ROOF DRAIN
 - ▣ STORM DRAIN
 - ASSUMED STORMWATER FLOW DIRECTION
 - ASSUMED PROPERTY BOUNDARY
 - ◆ GROUNDWATER MONITORING WELL

0 25 50
Scale in feet

BASE MAP SOURCE:

Fuss & O'Neill Inc., Consulting Engineers. Figure Titled, "Site Plan Sample Location and Cross Section Line", Dated Feb. 2002.

Prepared/Date: JVM 11/15/11

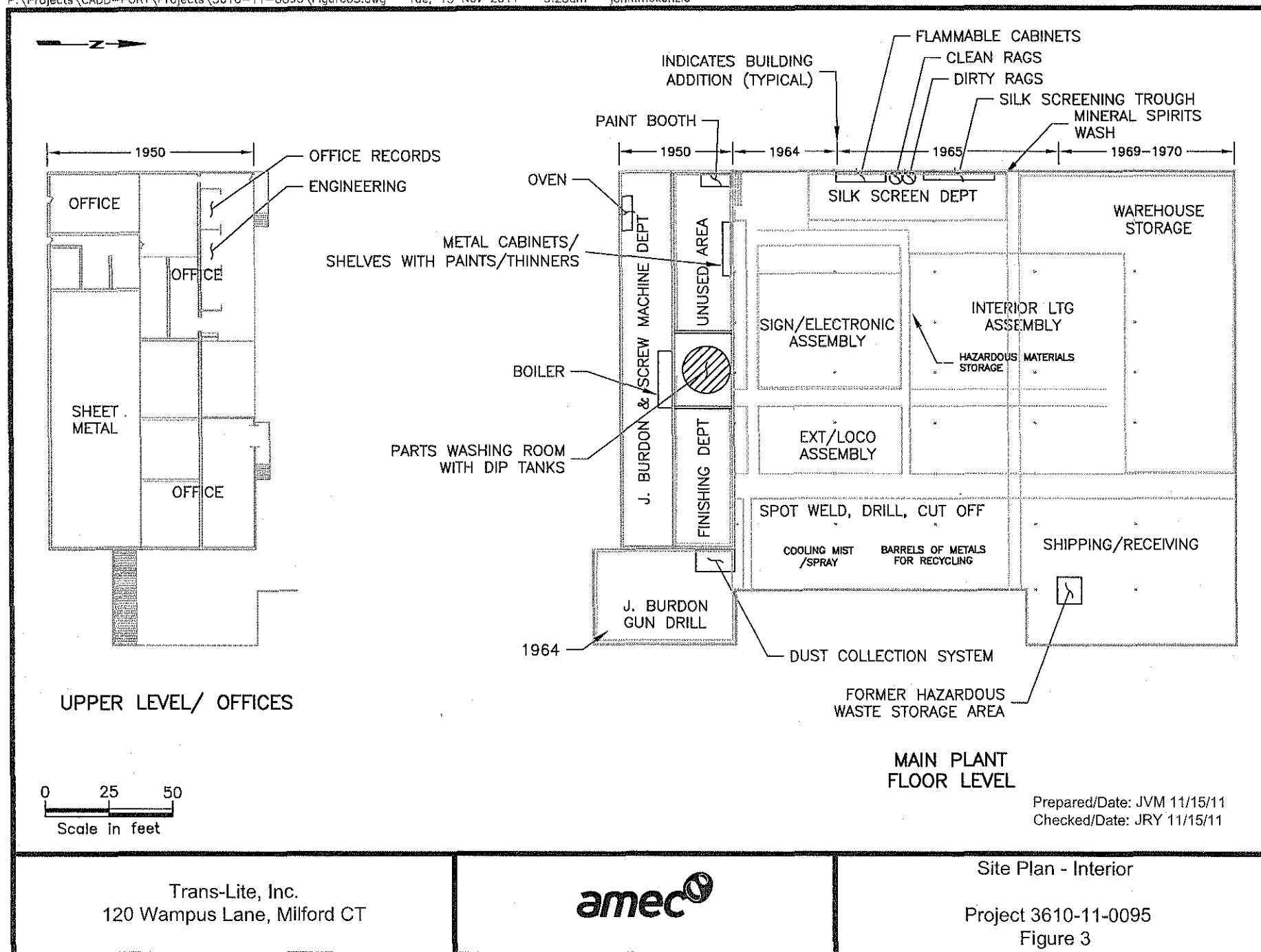
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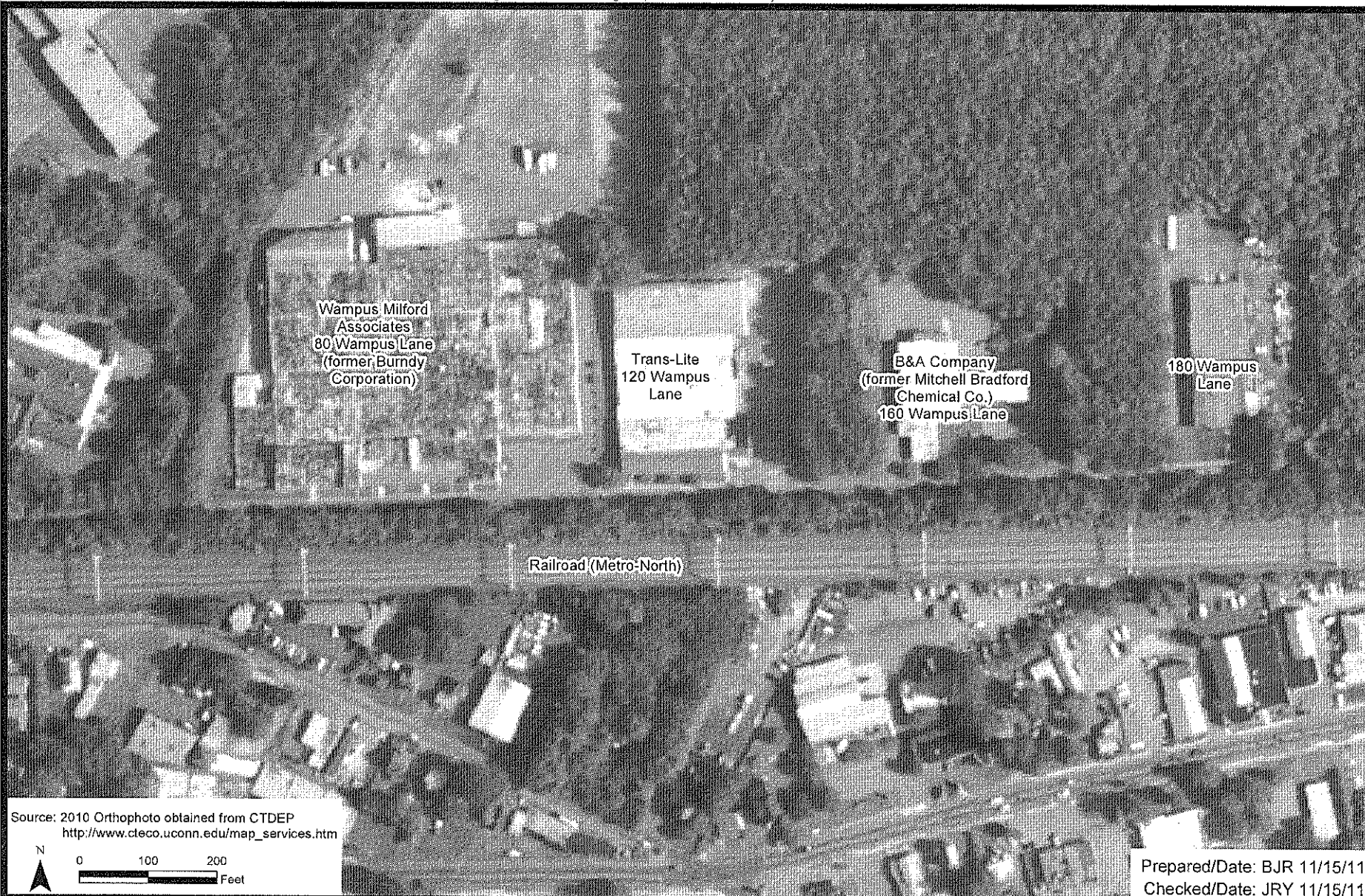
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Site Plan - Exterior

Project 3610-11-0095
Figure 2





Trans-Lite, Inc.
120 Wampus Lane
Milford, CT



Figure 4
Site and Surrounding Area
Project 3610-11-0095